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THE NATIONAL PARKS AND
NATIONAL HISTORIC SITES OF CANADA

Canada

LES PARCS NATIONAUX ET LES
LIEUX HISTORIQUES NATIONAUX DU CANADA

Guide to the Preparation of

COMMEMORATIVE INTEGRITY STATEMENTS

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Parks Canada Parcs Canada

Canada

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1.0 Introduction to the *Guide*

This *Guide* and associated *Guidelines* are designed to provide guidance in the preparation of a Commemorative Integrity Statement (CIS) for a national historic site. The objective is to provide all the information necessary to those responsible for preparing these statements. This includes owners of national historic sites, local, regional and national interest groups who become involved in CIS preparation and Parks Canada personnel. The *Guide* and *Guidelines* were prepared in consultation with experienced practitioners.

This *Guide* and *Guidelines* form the basis on which CISs for sites administered by Parks Canada and others will be reviewed for approval.

This tool has two parts. The *Guide* contains the basic information for preparing statements. It is supported by the *Guidelines,* which contain additional information for those who require more detail or have particular issues that they wish to address.

The *Guide* and *Guidelines* are intended to allow users to prepare CISs in a consistent manner that effectively reflects the resources, values and messages of a site. At the same time, wider understanding of what is required simplifies the process, ensuring that statements done in compliance with the *Guide* and *Guidelines* are developed and reviewed more quickly. As the *Guide* and *Guidelines* provide the basis for approval, adherence to these ensures that a statement will be more easily and quickly approved.

1.0.1 What is a National Historic Site?

A national historic site is a place that has been designated by the Minister of Canadian Heritage on behalf of the federal government as being a place of national historic significance. The Historic Sites and Monuments Board of Canada (HSMBC) is appointed by the federal government to provide advice to the Minister concerning designation of sites. See Guideline No. 1 - *Glossary*, for a fuller description of the term national historic site.

1.1 The Concept of Commemorative Integrity

1.1.1 Why was the Concept of Commemorative Integrity Developed?

The concept of commemorative integrity was developed for the 1990 *State of the Parks Report*, as a framework to evaluate and report on the health and wholeness of national historic sites.

The *Parks Canada Agency Act* (1998) states that it is in the national interest to ensure the commemorative integrity of national historic sites.

Commemorative integrity and CISs have resulted in a more systematic and comprehensive identification and consideration of all heritage values, demonstrating that the inclusion of one value need not be at the expense of another.

1.1.2 What is Commemorative Integrity?
Commemorative integrity refers to the condition or state of a national historic site when the site is healthy and whole. This is the desired state for a national historic site.

To help understand the term, it is useful to look at the two words 'commemorative' and 'integrity'. The word 'commemorative' refers to why this place is a national historic site. 'Integrity' refers to health, wholeness and honesty.

A national historic site possesses commemorative integrity when:

- the resources directly related to the reasons for designation as a national historic site are not impaired or under threat,
- the reasons for designation as a national historic site are effectively communicated to the public, and
- the site's heritage values (including those not related to the reasons for designation as a national historic site) are respected in all decisions and actions affecting the site.

These three bulleted statements are commonly referred to as the 'three elements' of commemorative integrity. References to these elements appear throughout this *Guide*.

Resources directly related to the reasons for the site's designation are level 1 resources as defined in Parks Canada's *Cultural Resource Management (CRM) Policy*.

Resources that are not related to the reasons for designation as a national historic site are defined as level 2 in the *CRM Policy*.

1.2 The Commemorative Integrity Statement (CIS)

A CIS is a document which defines what is meant by commemorative integrity for a particular national historic site. It provides a baseline for planning, managing, operating, reporting and taking remedial action.

A CIS should describe the place, its resources, values, objectives and messages in a way that reflects the richness of the national historic site. It should present pertinent information only, not the detail that would be found in planning documents (such as a management plan, business plan, marketing plan or other functional plan), or inventories (site object catalogue, site plans or records).

For Parks Canada administered sites, the CIS must be approved by the Director General for the national historic sites program as well as the Field Unit Superintendent.

A CIS is meant to be valid over a period of at least twenty years. If the Minister approves changes to a site's Designated Place or the reasons for designation as a result of recommendations by the HSMBC **after** the CIS has been approved, the statement will need to be amended accordingly.

1.3 Why prepare a CIS?

A CIS is required for each national historic site which falls under Parks Canada's

administration. The CIS is also used as the primary basis for planning under the National Historic Sites of Canada Cost-Sharing Program.

Owners of national historic sites not eligible for cost-sharing have also recognized the value of a CIS. CISs have been prepared for numerous non-Parks Canada administered sites.

A CIS guides site management by:

- identifying what is most important about a site relative to the national historic designation and, for Parks Canada sites, ensuring that matters relating to national significance, including resources and messaging, are the highest management priority.
- ensuring that there is a focus on the "whole", and not just the individual resources.
- providing the fundamental document to guide management planning and preparation of a conservation and presentation plan (for the National Historic Sites of Canada Cost-Sharing Program), which detail specific actions to be carried out.
- enunciating a set of heritage values and objectives which can be used in analysing and evaluating the impact of development and adaptive re-use proposals on a site or nearby property.
- providing the basis for design guidelines for development which may take place within or nearby and which may have an impact on the national historic site.
- giving direction on heritage messages for marketing plans and programs.

1.3.1 The CIS and Parks Canada's Planning and Reporting Cycle

As the statement of core values for a national historic site, the CIS is integral to all planning and reporting for sites administered by Parks Canada. Several pieces of legislation provide a context for CIS development.

The CIS is directly linked to the management plan. Parks Canada's *Guide to Management Planning* states that "Ensuring commemorative integrity is the core objective of a national historic site management plan. The commemorative integrity statement, as the site-specific analysis of what constitutes a state of commemorative integrity at a particular national historic site, is fundamental to any management plan." The management plan, in turn, guides the actions laid out each year in business plans.

The CIS is the basis for evaluating the success of the management plan, by establishing whether the actions in the last plan have helped to ensure commemorative integrity.

Whether the site is in a state of commemorative integrity is also evaluated against the CIS. The results of this evaluation contribute to the next management plan and to the *State of*

Protected Heritage Areas Report, Parks Canada's accounting to parliament on the health of national historic sites.

1.4 Preparing for the Development of a Site's CIS

A clear understanding of Parks Canada's *CRM Policy* is the best preparation for developing a CIS. The policy can be found in *Parks Canada Guiding Principles and Operational Policies*, pp. 99-115, which is on the Parks Canada web-site *www.parkscanada.pch.gc.ca*

A solid understanding of the history of the site and its resources is also required before starting the CIS.

> Guideline No. 3 - ***Process, Roles and Approvals for Developing Commemorative Integrity Statements*** provides details about the process of CIS development.

Commemorative integrity is the *CRM Policy* tailored to a specific national historic site. A series of questions directly related to the *CRM Policy* has been developed for managers and those responsible for preparing a CIS. See Guideline No. 2 - *CRM Policy and the Commemorative Integrity Statement.*

These questions are intended to:

- Help managers assess the readiness of a site for a CIS exercise. (Have all resources been inventoried and evaluated? Are records and inventories relating to cultural resources, including basic data, records of decisions, actions taken and heritage recording, up to date?).
- Provide a focus for review at the end of each section of the CIS to ensure that nothing has been overlooked. (Are cultural resources valued within the relevant context? Is the significance of the site communicated effectively? Were all resources given initial consideration as potential cultural resources?).
- Link the site's everyday operations to the *CRM Policy*.

These questions can also be used in planning and management of the site. The primary goal for Parks Canada managers of national historic sites is to ensure commemorative integrity and the application of cultural resource management principles and practice, in compliance with the *CRM Policy*.

1.5 What Geographic Area Should be Included in the CIS?

A CIS is usually written for a specific geographic area. The extent of the geographic area which is covered by the CIS needs to be considered carefully and should be guided by the following:

- The CIS must include all of the Designated Place (i.e., the place designated as being of national historic importance). Where the Designated Place is larger than the administered property, the CIS also includes those

parts of the Designated Place which lie outside the property.

- Where the size of the administered property is so large that it overwhelms the Designated Place, consideration should be given to decreasing the area included in the CIS. For example, the whole of the University of Toronto would not be included in a CIS for Annesley Hall National Historic Site of Canada (NHSC).

- For national historic sites not under Parks Canada's administration, the scope of the CIS should be determined in consultation with Parks Canada. It must include the Designated Place but may be larger where appropriate.

1.6 Who is Involved in the Preparation of a CIS?

Preparing a CIS for a site must be done by a multi-functional team. This includes appropriate specialists/experts (see below), other individuals who are knowledgeable about the site, and representatives from the site's management and operations. Different sites may require different specialists.

Specialists/experts include:
- archaeologists
- architects
- architectural historians
- curators
- heritage presentation specialists
- historians
- landscape architects
- material culture specialists
- underwater archaeologists
- planners

Opportunities for stakeholder input should be encouraged.

The owner(s) of all lands being considered must be consulted in preparing the CIS. This is particularly important where the Designated Place is not all contained within one property.

In cases where the site is not operated by the owner, the operator should also be involved.

In some instances, specialists may not participate directly in preparing the CIS but will be involved in a review and advisory capacity.

The CIS should be prepared in consultation with someone knowledgeable about the requirements and the process.

The CIS should include the names, positions and organizations of those involved in its preparation as an appendix.

1.7 What's the Format for a CIS?

The CIS is a document intended for managers and decision-makers. It provides relevant information in a clear, succinct style, using plain language and bullet format to list resources, values, the messages that flow from these values, and objectives.

Following the standard format ensures consistency, both in the statements themselves and in follow-up monitoring. It builds on the experience of managers and owners from across the country, presenting diverse information in a cohesive and coherent manner.

The format for a CIS is shown in Guideline

No. 4 - *Templates*. The CIS is presented in six sections:

- **Introduction.** This includes the site's background, the national historic sites program objectives, and information on commemorative integrity and the CIS.

- **Designation and Context.** This section contains the historic and geographic context, the site's Statement of Commemorative Intent and description of Designated Place, along with information about the designation.

- **Resources Directly Related to the Reasons for Designation as a National Historic Site.** This contains details on the site as a whole and individual resources that relate to the reasons for designation. It includes a description of the resources, the historic values for each cultural resource or resource category and objectives for managing the resources.

- **Effective Communication of the Reasons for Designation as a National Historic Site**. This identifies the reasons for the site's designation and objectives for ensuring these are communicated effectively.

- **Resources, Values and Messages Not Related to the Reasons for Designation as a National Historic Site.** This section contains additional information on resources, values and messages which are important but not related to the reasons for designation, and objectives for their protection and presentation.

- **Appendices.** Each CIS should contain the following:
  - all HSMBC recommendations and records of decision from minutes, and approved plaque texts.
  - a map of the national historic site showing Designated Place and geographic context (here or in the Designated Place section of CIS).
  - a list of CIS team members including their position and organization.

Other appendices may be added as required.

2.0 Instructions for the Preparation of Commemorative Integrity Statements

This section of the *Guide* is organized in the same way as a Commemorative Integrity Statement (CIS), dealing with the introduction, designation and context, and the three elements of commemorative integrity. For material which is to be used *verbatim* in the CIS, reference is made to Guideline No. 1 - *Glossary*.

2.1 Introduction

This section should be divided into four parts:

- Overview
- National Historic Sites Program Objectives
- Commemorative Integrity
- *Cultural Resource Management Policy*

2.1.1 Overview

This section should be brief (no longer than 10 lines). The overview should provide an understanding of the site and its designation as a national historic site.
It should explain:

- why it is important
- where it is located
- who currently owns/manages it
- what was designated
- when it was designated

2.1.2 National Historic Site Program Objectives

These objectives provide the context in which a CIS is undertaken. The objectives are to be quoted directly from Guideline No. 1 - *Glossary*.

2.1.3 Commemorative Integrity

This section should include the definition of commemorative integrity and the definition of a CIS. This information is to be taken directly from Guideline No. 1 - *Glossary*. Depending on the national historic site or the particular circumstances under which a CIS is written, it may be appropriate to include information on the benefits of doing a CIS . Refer back to section 1.3 - *Why prepare a CIS?*.

2.1.4 *Cultural Resource Management (CRM) Policy*

This section should include a discussion of management under the *CRM Policy*, including the following points:

Cultural resource management is an integrated and holistic approach to the management of cultural resources. It applies to all activities that affect cultural resources, including the care taken of these resources and the promotion of public understanding and enjoyment of them. The objective is to manage cultural resources in accordance with the principles of value, public benefit, understanding, respect and integrity.

Parks Canada's *CRM Policy* defines cultural resources as places or human works that have been determined to have historic value. Cultural resources include those directly related to the reasons for the site's national significance and those not related but which possess historic value.

The *Policy* is the basis for management of cultural resources by Parks Canada. Other owners of national historic sites are encouraged to apply the principles and practice from the *CRM Policy*.

Effective cultural resource management practice is based on:

1. an up-to-date inventory of resources;

2. an evaluation of resources to determine which are to be considered as cultural resources and what it is that constitutes their historic value;

3. consideration of historic value in actions affecting conservation and presentation. Most, if not all, operational activities have an impact on conservation or presentation;

4. monitoring and review to ensure that conservation and presentation objectives continue to be met effectively.

A CIS sets out the results of the first two points above in order to facilitate the third and fourth.

The objectives in a CIS specify that the site should be managed in accordance with the principles and practice of the *CRM Policy*. In addition to the principles and practice, management under the *CRM Policy* means:

- cultural resources and their values are inventoried and evaluated, and these records are kept up to date;

- there are no uses or threats that reduce the potential for long-term conservation and future understanding and appreciation of the cultural resources;

- any modification to the site or its cultural resources is based on sound knowledge and respect for the historic values of the resources and is preceded by adequate research, recording, and investigation;

- conservation measures are based on direct, rather than indirect evidence, follow the path of least intrusive action, and are clearly recorded;

- any new work at or adjacent to the site is sensitive in form and scale to the site and its associated resources;

- monitoring and review systems are in place to ensure the continued survival of the cultural resources with minimum deterioration;

- reproductions and reconstructions are marked in such a way as not to be confused with the originals they are intended to represent;

- the historic value of the resources is fully considered and integrated into the planning, conservation, presentation and operational programs.

2.2 Designation and Context

This section should contain specific information relating to:

- Designation
- Commemorative Intent
- Designated Place
- Historic and Geographic Context

2.2.1 Designation

This section should present information relating to designation as a national historic

site. It is based on the HSMBC minutes and plaque texts. It should be clear from this presentation how the Statement of Commemorative Intent and Designated Place were derived. Since Fall 1999, the HSMBC has explicitly identified commemorative intent and Designated Place.

The text of all of the HSMBC's recommendations and all plaque inscriptions should be appended to the CIS in an appendix.

2.2.2 Commemorative Intent

2.2.2.1 Definition

Commemorative intent refers to the reasons for designation as a national historic site as determined by the Ministerially-approved recommendations of the HSMBC to the Minister.[1] Commemorative intent is derived from HSMBC documents.

The definition of Commemorative Intent, contained in Guideline No. 1 - *Glossary*, is to be included as part of the CIS.

2.2.2.2 Preparing the Statement of Commemorative Intent

Each CIS will contain a Statement of Commemorative Intent. The Statement of Commemorative Intent provides the answer to the question "When and for what reason was this place designated as a national historic site?"

The preparation of the Statement of Commemorative Intent is carried out by Parks Canada staff following the procedures outlined in Guideline No. 3 - *Process, Roles and Approvals for Developing Commemorative Integrity Statements* and Guideline No. 6 - *Developing the Statement of Commemorative Intent.*

2.2.3 Designated Place

2.2.3.1 Definition

Designated Place refers to the place designated by the Minister of Canadian Heritage on the recommendation of the HSMBC. Information on what constitutes the Designated Place for a particular national historic site is drawn from the minutes of the HSMBC. The definition of Designated Place is to be included as part of the CIS.

2.2.3.2 Preparing the Description of Designated Place

The Designated Place for a national historic site must be described in the CIS to ensure a clear understanding of what was designated by the Minister. The Designated Place is a geographically definable location which is circumscribed by boundaries. A map of the site should be included as part of the CIS (either in the Designated Place section or as an appendix) showing the Designated Place clearly. A notional circle around the administered site is not sufficient.

The preparation of the description of Designated Place is carried out by Parks Canada staff following the procedures outlined in Guideline No. 3 - *Process, Roles and Approvals for Developing Commemorative Integrity Statements* and Guideline No. 7 - *Designated Place.*

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[1] Recommendations were not formally approved as a matter of course by the Minister until the passage of the *Historic Sites and Monuments Act* of 1953. Pre-1953 HSMBC deliberations were not framed as recommendations but rather as "moved" and "carried". These have been accepted as designations unless explicitly rejected by the Minister or senior departmental officials.

2.2.4 Historic and Geographic Context

2.2.4.1 Historic Context

This section should provide the historic context for the site. It should be concise, no more than a page in length. It is an overview to assist the reader in understanding:

- the nature of the site during the period or periods for which it is commemorated. A description of the site in historical times is particularly important for those designations which refer to a specific time frame or are associated with a specific event. Note that the site in historical times will not necessarily correspond with the Designated Place.

- the evolution of the site. Most sites have evolved over time. This section provides information relating to the site's evolution, use and the individuals associated with it.

2.2.4.2 Geographic Context

In many cases the geographic context of the site should be discussed. This should be included when it is important to an understanding of the site's national significance, for example when the HSMBC decision refers to areas around the site or when the site's importance relates to its geographic setting.

Geographic context should be kept to the minimum necessary to ensure an understanding of the site's national historic significance. This section should also include direct and explicit links between this site and other places that are integral to its national historic significance. For example, the geographic context of a fur trade site would identify sources of supply, as well as intermediate and end-markets.

A map should be included, either in this section or as an appendix, to assist in understanding the geographic context.

2.3 Resources Directly Related to the Reasons for Designation as a National Historic Site

2.3.1 Introduction

This section should contain details on the resources - the whole and the parts of the whole - which are directly related to the reasons for designation. Under the *CRM Policy*, these are known as level 1 resources.

The CIS must list and describe all resources which have been evaluated as resources directly related to the reasons for designation as a national historic site. This section must also include a description of the historic values of these resources.

The section on values must be followed by a section outlining the conditions necessary to ensure that the resources are not impaired or under threat, which provides guidance on the management of the site. It is here that what is meant by "not impaired or under threat" is defined in the context of the specific site.

2.3.1.1 Definition

As stated in the *Glossary*, ***resources directly related to the reasons for designation as a national historic site*** include:

- the Designated Place.

- *in situ* cultural resources within the administered place that have a direct relationship with the reasons for designation. In rare cases, the HSMBC has specifically identified resources which relate to or have national historic significance, in which case, these are the

only *in situ* cultural resources recorded in this section.

- cultural resources identified in the HSMBC minutes as contributing to the national significance of the Designated Place, including resources outside the Designated Place.

- objects which have a direct relationship to the commemorative intent and to the site. These may be located either within or outside the Designated Place.

2.3.1.2 Identifying Resources Directly Related to the Reasons for Designation
The CIS should identify the resources directly related to the reasons for designation as a national historic site.

Where the list of these resources is extensive it can be summarized in this section with the full list of cultural resources in an appendix. Groups of resources that share values may be treated together.

The evaluation of resources, including the identification of values, is done by a multi-disciplinary team. This ensures that a variety of perspectives is represented, a degree of consistency is achieved and that determination of value does not rely solely on one specific function or aspect.

The Designated Place should be considered first, followed by its historic values. In cases where the Designated Place is a single feature, a building or archaeological site for example, the values should be dealt with under Designated Place. A separate section on buildings and structures or on archaeological sites may not be needed.

The balance of the resources which are directly related to the reasons for designation should be categorized by type in the same way as in the *State of Protected Heritage Areas Report* with sections on:

- Landscapes and Landscape Features.
- Buildings and Structures.
- Archaeological Sites.
- Objects.

In cases where there are resources or values directly related to the reasons for designation which do not fit the categories above, they should be described under an appropriate heading.

2.3.2 Historic Value
Integral to commemorative integrity is an understanding of historic value. If the owner/manager does not know "where value lies", it is impossible to manage cultural resources appropriately or to achieve commemorative integrity. Knowing what the values are, or where value lies, is fundamental to stewardship.

A sound understanding of historic value also allows decision-makers to determine what is appropriate or inappropriate. It provides the foundation for ensuring that proposals, projects and other initiatives are built on the principles of cultural resource management. Where proposals are generated externally, knowing where value lies makes it possible to assess impact on the cultural resource and its historic values.

Clear, thorough, and precise articulation of each resource's values is critical to the success of a CIS.

2.3.2.1 Definition
Historic value is a value or values assigned to a resource, whereby it is recognized as a cultural resource. These values can be

physical and/or associative.

2.3.2.2 Describing Historic Values
Historic values should be clearly stated for each cultural resource or group of resources, avoiding duplication while still capturing the reasons for the importance of the resource.

The *CRM Policy* principles identify a number of key aspects of historic value which should be considered when evaluating resources:

- ***Qualities and features which relate to the resource's national historic significance***. For example,[2] at the Basilica of St. John the Baptist, in St. John's, one of the reasons for designation relates to the building's Lombard Romanesque Revival architecture. This value includes the features of the Basilica design which characterize the Lombard Romanesque Revival style, such as the use of the round arch, the two tier arcade, the smooth wall surfaces, the twin bell towers with pyramidal roofs, the interior classically inspired features and the detailing.

- ***The resource in its context***. For example, one of the values for the Gulf of Georgia Cannery's cannery building is the physical relationship of the building to navigable water, which is central to its historic function.

- ***The whole and its parts***. For example, Red Bay is valued for its association with 16th century Basque whaling activities. The shore stations are valued for their association with processing whales (for example flensing and rendering), even though they do not individually capture the breadth of the whole.

- ***The evolution of the resource over time, not just its existence at a single moment in time.*** For example, one of the values for the Oil Drum Shed at the Gulf of Georgia Cannery is that it illustrates the changes in the fishing industry over time. It also demonstrates the industrial role of the Gulf of Georgia Cannery building in particular, especially the development of fish oil products during and after the Second World War.

- ***The interaction of nature and human activities***. For example, Kitwanga Fort was designated in part for the presence of an 18th century Gitwangak hill top fort. The natural hill itself should be valued for the strategic defensive position it provided for the site.

- ***Viewscapes and viewsheds***. For example, in recommending the Former Provincial Lunatic Asylum in Saint John for designation, the HSMBC noted the importance of the varied and attractive vistas, such as the unobstructed view from the building to the Reversing Falls. When articulated as values, view planes should be specific about where they are and what they contain. Views often include features that are not, in themselves, evaluated as resources in the CIS.

- ***Continued or traditional uses***. For example, the Banff Springs Hotel is of value for its continued use as a hotel.

[2] All examples used in this document are consistent with the direction in the *Guide* and *Guidelines*. They may not be identical to existing CISs.

Continuity of use is often a powerful value, particularly at non-museological sites.

Values can be physical (where value is reflected in a specific tangible feature of the resource) and/or associative (where value is reflected in its connection with a theme, person or event of historic importance). Associative value is also known as symbolic value. Physical and associative values should not be separately identified when listing them in the CIS.

A physical description or a short history of a resource is not adequate as a description of values.

A resource may possess historic values both related to the reasons for designation and unrelated to those reasons. Both types of values can be dealt with in this section of the CIS. However, the presentation of the values must distinguish between the two types. Generally, this is easily done by identifying and listing values directly related to the reasons for designation together followed by those that are not related.

Guideline No. 2 - *CRM Policy and the Commemorative Integrity Statement* provides a useful list of questions relating to identification of historic values.

2.3.3 Objectives for Cultural Resources

Clearly stated objectives for safeguarding and communicating historic values are fundamental to each CIS. Objectives serve as an essential bridge between the identification of historic values and planning, managing, and reporting on a national historic site.

Objectives in the CIS express the desired state of the site, its resources and their historic values. Objectives describe the ideal field conditions sought through management. Evaluating whether these conditions are met serves as the basis for identifying necessary policies and actions.

The objectives provide a framework for management activities and performance indicators for measuring the state of a site's commemorative integrity.

2.3.3.1 Writing Desired Outcomes as CIS Objectives

A set of objectives should be prepared for each of the three elements of the CIS. These should focus on results rather than efforts, and condition rather than strategies. The objectives should be designed for the long term, setting the stage for performance measurement of commemorative integrity without reference to specific timelines.

Certain objectives apply to all sites, as they are criteria essential to the definition of commemorative integrity. Other objectives will be site-specific, depending on individual circumstances. Every objective should relate to one or more values.

The following outcome objectives should be the same for all national historic sites. These are standard for all resources and should be stated only once at the end of this section of the CIS:

The resources (Designated Place, landscapes and landscape features, buildings and structures, archaeological sites, objects) will not be impaired or under threat when:

- ***the resources and their associated values are respected.*** The term respect

has several meanings. In the case of resources in good condition, respect means the resources and associated values are maintained so that there is no deterioration. In the case of resources not in good condition, respect means efforts to enhance the condition of the resources and associated values are based on the historic values of the resources. This outcome places attention on the state of the resource itself.

- ***management decisions are based on adequate and sound information and are made in accordance with the principles and practice of the CRM Policy.***

- ***the resources and their associated values are not lost, impaired or threatened from natural processes, for example erosion and decay, within or outside of the site.***

- ***the resources and their associated values are not lost, impaired or threatened from human actions within or outside of the site.*** This objective places attention on the human-induced threats which could adversely affect the resource's integrity. There are four sources of human threat:
  - human-induced natural threat (e.g., pollution, fire).
  - external human threat (e.g., adjacent property development which has an adverse impact).
  - internal human threat from use (e.g., vandalism, excessive wear and tear from overuse).
  - internal human threat from inappropriate management (e.g., on-site development which has an adverse impact).

- ***the historic values of the resources are communicated to visitors and stakeholders.***

Examples of site-specific outcome objectives, to be used as necessary, **could** include the following:

- ***new and evolving uses of the Designated Place respect its heritage-defining values.*** (This would apply at the Winnipeg Exchange District, for instance, which continues to be a vibrant business and social setting).

- ***partners and 3rd parties respect the resources and significance of place which make it a national historic site.*** (This would be appropriate at a site like Battle of the Windmill, which is operated by a third party).

- ***the fort is maintained as a ruin.*** (At Fort St. Joseph, the HSMBC defined the state in which the resource is to be managed. The CIS must define this ruined state in terms of physical and associative values – for example, form and appearance, contribution to sense of place).

- ***the Designated Place is not threatened by river erosion.*** (This objective should be used at sites like York Factory, where this has been identified as a significant and long-term threat).

The statements within quotes below are **not** considered outcome objectives. These statements represent management activities, which may help to ensure commemorative integrity. The statements in italics represent the desired outcomes. These should be used

as objectives in the CIS.

- "heritage impact assessment is conducted prior to development." This is a management prescription toward achieving the following outcome:
  - *the resources and their associated values are managed according to the principles of value, public benefit, understanding, respect, and integrity.*

- "all objects have been identified and inventoried." A more appropriate objective would be:
  - *the resources and their associated values are managed according to the principles of value, public benefit, understanding, respect, and integrity."*

- "The principles of the *CRM Policy* are applied to all contracts, leases, licensing concessions, agreements, partnerships, or other management tools." The outcome should be:
  - *partners and 3rd parties respect the cultural resources and significance of place which make it a national historic site.*

As the building tool for long-range planning and reporting, the CIS should include the more strategic outcomes, leaving the management actions to the management and business plans.

2.4 Effective Communication of the Reasons for Designation as a National Historic Site

2.4.1 Introduction

Protection is only one part of commemorative integrity. As the *National Historic Sites Policy* states (p. 78), "Protection and presentation are fundamental to commemoration, since without protection there can be no historic site to be enjoyed, and without presentation there can be no understanding of why the site is important to our history and, hence, to all Canadians."

This section of the CIS should identify the reasons for designation which must be communicated in order for the public to understand why the site is important. This section should also identify any additional essential information required to ensure the understanding of these reasons. It provides guidance, through objectives, on the effective communication of these messages.

2.4.1.1 Definition

The reasons for designation express, in the form of messages, why this place was designated a national historic site.

2.4.1.2 Describing Reasons for Designation

The reasons for designation are derived from the Statement of Commemorative Intent. In most situations there will be one message for each of the reasons contained in the Statement of Commemorative Intent.

For example, there are two points in the SOCI for Skoki Ski Lodge NHSC:
Skoki Ski Lodge was designated a national historic site in 1992. The reasons for designation, as derived from the 1992 HSMBC minute, are:

- *it is constructed in the Rustic Design Tradition, and;*
- *it is associated with tourism development and outdoor recreation in the national parks.*

Therefore, there are two reasons for designation for this site:

- ***Skoki Ski Lodge is constructed in the Rustic Design Tradition.***
- ***Skoki Ski Lodge is associated with tourism development and outdoor recreation in the national parks.***

2.4.2 Context Messages

2.4.2.1 Definition

Context messages are those messages that are essential to understanding the reasons for designation of the site. For example, one cannot appreciate the national historic significance of Skoki Ski Lodge without understanding what is meant by the Rustic Design Tradition. This is an essential context message.

2.4.2.2 Describing Context Messages

Context messages should be included with each reason for designation where they are needed to understand these reasons.

While context messages are essential to understanding the reasons for designation, they are not reasons for national significance.

Context messages should always be written in full sentences and not as topic headings or phrases.

The following example illustrates the relationship between the reasons for designation and context messages:

The reason for designation for Sulphur Mountain Cosmic Ray Station NHSC is:

> *The Sulphur Mountain Cosmic Ray Station played a role in the Canadian contribution to the International Geophysical Year 1957-58.*

This reason for designation is further explained by the following context messages:

- *International Geophysical Year was an international project of concentrated, coordinated exploration of the earth and its cosmic environment.*
- *Cosmic ray research was an important part of the International Geophysical Year.*
- *Canadian scientists made an important contribution to that research.*
- *The Sulphur Mountain Cosmic Ray Station was the most important Canadian station.*

2.4.2.3 This is a National Historic Site

Those who come in contact with national historic sites need to understand the concept of national historic site designation in order to fully appreciate the site's importance. Consequently, there is a standard context message relating to the designation.

The designation of Sulphur Mountain Cosmic Ray Station as a national historic site is explained by the following standard context message:

- ***Sulphur Mountain Cosmic Ray Station is a national historic site, a place designated by the Government of Canada as a site of importance to all Canadians because of its national historic significance.***

2.4.3 Objectives for Effective Communication

This section should describe the objectives for the effective communication of the reasons for the site's designation.

In the second element of commemorative integrity, the audience to be reached is

defined as the *public*. This includes on-site and virtual visitors, as well as stakeholders. The audience also includes the site stewards: owners, managers and staff.

Effective communication means that the overall heritage presentation program for a site, in terms of all methods used to reach the public, conveys the reasons for the site's designation. It also implies that those who experience heritage presentation understand these reasons. It is not sufficient to merely present the reasons for designation to the public; efforts must be made to ensure the public understands them. The success of heritage presentation programming should be monitored to ensure its effectiveness.

2.4.3.1 Identifying Objectives for Effective Communication

The objectives for the effective communication of the reasons for designation will read as follows:

The reasons for designation as a national historic site are effectively communicated to the public when:

- ***the overall heritage presentation experience conveys the reasons for designation as a national historic site.***
- ***visitors and the site stewards understand the reasons for designation as a national historic site.***
- ***management decisions are based on adequate and sound information and are made in accordance with the principles and practice of the CRM Policy.***

Site-specific objectives relating to messaging may be needed. These can be added as required. The objectives should be prepared in accordance with section 2.3.3 - *Objectives for Cultural Resources*.

An example of a site specific messaging objective is:

- *visitors appreciate and understand differing contemporary views and later interpretations of the history and events associated with the site's national historic significance* (This should be used at a site like Batoche, where history and events are complex or disputed).

Site-specific objectives should be written as goals, **not** as management activities which may lead to the goal. Instead of writing "a heritage communication strategy is developed and implemented," the objective should be that *visitors understand the reasons for designation as a national historic site.*

2.5 Resources, Values and Messages Not Related to the Reasons for Designation as a National Historic Site

Some resources, values and messages are not related to the reasons for designation. This section should contain information on these.

In applying the first element of commemorative integrity, emphasis is clearly on resources directly related to reasons for designation as a national historic site and their values. However, the *CRM Policy* applies to all cultural resources, as well as significant ecosystem features.

A CIS is developed to assist managers/owners in managing all the resources for which they have responsibility. The overall stewardship of a national

historic site is called into question and commemorative integrity is threatened if resources not related to the reasons for designation are not managed in accordance with the *CRM Policy*.

The following should be included in this section of the CIS:

- resources not related to reasons for designation (both cultural and natural), with their values and objectives.
- any other values of the site not related to the reasons for designation, with their objectives.
- messages not related to reasons for designation, with their objectives.

2.5.1 Resources and Values Not Related to the Reasons for Designation

2.5.1.1 Identifying Resources Not Related to the Reasons for Designation

Section 2.2.2.1 of the *CRM Policy* states that "Parks Canada will establish and apply criteria to determine which resources under its jurisdiction are of this type. A resource may be included in this category by virtue of its historical, aesthetic or environmental qualities. Criteria will also give consideration to factors such as regional or local association; or provincial, territorial or municipal designations."

The identification of cultural resources not related to reasons for designation is done by a multi-disciplinary team. This ensures that a variety of perspectives are represented and a degree of consistency is achieved. This team should include representatives from all cultural resource management functions, but must have the requisite information and specialists on what is being evaluated.

The team evaluating the resources will give consideration to the evaluation done by others such as provincial, territorial or municipal designations.

Classified or Recognized Federal Heritage Buildings will automatically be considered as resources in this category, unless they meet the requirements that have been described for resources directly related to the reasons for designation as a national historic site, as per the *CRM Policy*.

With the exception of the evaluation of federal heritage buildings, there are no national evaluation guidelines for resources which fall into this category.

Natural ecosystem features of special significance as outlined in section 1.1.7 of the *CRM Policy* should also be described here.

Any resource not related to the reasons for designation, but part of the area for which the CIS is being written, should be included in this section of the CIS. In cases where such resources are numerous, they should be presented in a way which does not overwhelm the resources directly related to the reasons for designation as a national historic site.

2.5.1.2 Identifying Values Not Related to the Reasons for Designation

This section is used to identify those heritage values that are important for the site and have not already been dealt with elsewhere in the CIS.

2.5.1.3 Objectives for Resources and Values Not Related to the Reasons for Designation

The CIS should include a set of objectives for resources and heritage values not related

to the reasons for designation. The standard objectives which are used for resources directly related to the reasons for designation, described in section 2.3.3.1, should be used.

2.5.2 Messages Not Related to the Reasons for Designation

2.5.2.1 Identifying Messages Not Related to the Reasons for Designation

This section should contain any messages not related to reasons for designation which are to be communicated at the site. All messages should be expressed in full sentences.

These messages must include:

- a message about the family of national historic sites.
- a message linking the site to other national historic sites related to it thematically or geographically.
- a message about related national historic designations of people or events.
- a message about international, provincial or municipal designations relating to the site.
- at sites administered by Parks Canada, a message stating that these sites belong to all Canadians.

2.5.2.2 Objectives for Messages Not Related to the Reasons for Designation

The following objectives should be the same for all national historic sites. These are standard for all messages and should be stated only once:

The messages not related to the reasons for designation as a national historic site are effectively communicated to the public when:

- ***part of the heritage presentation experience conveys the messages not related to the reasons for designation as a national historic site.***
- ***the messages not related to the reasons for designation as a national historic site and their presentation do not overwhelm or detract from the presentation and understanding of the site's national historic significance.***
- ***visitors understand the messages not related to the reasons for designation as a national historic site.***
- ***management decisions are based on adequate and sound information and are made in accordance with the principles and practice of the CRM Policy.***

2.6 Appendices

In an attempt to keep the CIS focused, information which is not essential to understanding commemorative integrity for a site should be in an appendix. For example, if those preparing a CIS feel that additional details about the site's history should be included to help the reader, a separate appendix can be added. There are several appendices, however, which are essential.

The CIS should have the following material appended to it:

- *All HSMBC minutes and plaque texts* which are relevant to the designation, Designated Place and commemorative intent exclusive of *the Secretary's Report,* and *Chair's Report.*
- *Map of the national historic site*

showing Designated Place and geographic context (may be included in the body of the CIS).

- *List of CIS team members* including their position and organization.

Other information may be included in the appendices, such as a list of resources and their level according to the *CRM Policy*.

Guideline No. 1

Glossary

The definitions in the Glossary have been drawn from references such as *Parks Canada's Guiding Principles and Operational Policies* and the *Guidelines for the Preparation of Commemorative Integrity Statements (October 1995)*. Some definitions have been amended for clarity and to reflect evolution in the thinking on commemorative integrity.

Administered property is the property administered by a custodian or authority which includes part or all of the Designated Place.

Archaeological site encompasses surface, subsurface or submerged remains of human activity at which an understanding of these activities and the management of these resources can be achieved through the employment of archaeological techniques.

Commemoration means, in the case of national historic sites, activities which contribute to commemorative integrity.

Commemorative integrity describes the health and wholeness of a national historic site. A national historic site possesses commemorative integrity when:

- the resources directly related to the reasons for designation as a national historic site are not impaired or under threat,
- the reasons for designation as a national historic site are effectively communicated to the public, and
- the site's heritage values (including those not related to designation as a national historic site) are respected in all decisions and actions affecting the site.

Resources directly related to the reasons for the site's designation are level 1 resources as defined in Parks Canada's *Cultural Resource Management* (CRM) *Policy*. Resources that are not related to the reasons for the site's designation but which have historic value are defined as level 2 in the *CRM Policy*.

Commemorative Integrity Statement (CIS) is a document which identifies what is meant by commemorative integrity at a particular national historic site. It provides a baseline for planning, managing, operating, reporting and taking remedial action. The document is divided into six parts:

1. *Introduction*
2. *Designation and Context*
3. *Resources Directly Related to the Reasons for Designation as a National Historic Site* - This section of the CIS identifies the resources that relate directly to the reasons for the site's designation. It also describes the historic values of these resources, which can be physical as well as associative or symbolic. These values must be safeguarded and communicated. The CIS provides guidance, through objectives, about the meaning of "not impaired or under threat" in the context of the site.
4. *Effective Communication of the Reasons for Designation as a National Historic Site* - This section of the CIS identifies reasons for designation as a national historic site, as well as any additional, essential information required to ensure their understanding. It provides

guidance, through objectives, on integrity in presentation and effective communication of messages with audiences.

5. *Resources, Values and Messages Not Related to the Reasons for Designation as a National Historic Site* - This section of the CIS covers resources, values and messages that are not related to reasons for designation as a national historic site. Objectives provide guidance on the management of these.
6. *Appendices*

Parts 3, 4, and 5 are referred to as the three elements of the CIS.

Commemorative intent refers to the reasons for a site's designation as a national historic site, as determined by the Ministerially-approved recommendations of the Historic Sites and Monuments Board of Canada. A CIS contains a ***Statement of Commemorative Intent (SOCI)*** which provides the answer to the question "When and for what reason was this site designated by the Minister responsible for the *Historic Sites and Monuments Act* as a national historic site?"

Conservation encompasses the activities that are aimed at safeguarding a cultural resource so as to retain its historic value and extend its physical life.

Cultural landscape is any geographic area that has been modified, influenced, or given special cultural meaning by people. A cultural landscape may be evaluated as a cultural resource if it is determined to have historic value.

Cultural resource is

- a human work, or
- a place which gives evidence of human activity or has spiritual or cultural meaning

and which, in either case, has been determined to have historic value.
Cultural resources cover a broad spectrum, ranging from the whole to the parts that make up the whole, i.e. a national historic site is a cultural resource as are parts of the site such as landscapes, buildings, archaeological sites and objects that have been determined to have historic value.

There are two categories of resources:
1. ***Resources directly related to the reasons for designation as a national historic site*** include:

- the Designated Place.
- *in situ* cultural resources within the administered place which have a direct relationship to the reasons for designation. In rare cases the HSMBC has specifically identified resources which relate to or have national historic significance, in which case, these are the only *in situ* cultural resources recorded in this section.
- cultural resources identified in the HSMBC minutes as contributing to the national historic significance of the Designated Place including resources which may be outside the Designated Place.
- objects which have a direct relationship to the commemorative intent and to the site. These may be located either within or outside the Designated Place.

2. A ***resource not related to the reasons for national significance*** is any other resource which has historic value. A resource may be included in this category by virtue of its historical, aesthetic or environmental qualities.

***Cultural resource management** (CRM)* is the generally accepted practice for the conservation and presentation of cultural resources, founded on principles and carried out in a practice that integrates professional, technical, administrative and operational activities so that the historic value of cultural resources is taken into account in actions that might affect them. In Parks Canada, cultural resource management encompasses presentation and use, as well as conservation, of cultural resources and is guided by Parks Canada's *CRM Policy*.

Designated Place refers to the place designated by the Minister of Canadian Heritage on the recommendation of the Historic Sites and Monuments Board of Canada. Information on what constitutes the Designated Place for a particular historic site is drawn from the minutes of the HSMBC. See ***historic place***.

Designation refers to the establishment of a national historic site. It occurs when the Minister approves a recommendation for national historic significance from the Historic Sites and Monuments Board of Canada.

Federal heritage building is any federally administered building that has been designated by the Minister of Canadian Heritage under the *Treasury Board Heritage Buildings Policy*.

Heritage values are attributes of a resource which have value. Heritage values derive from many sources, including historical associations, architectural features or significance, environmental importance, associations with the community, and continuity of use.

Historic and geographic context includes information about related natural and cultural features and events which aids in developing a full understanding of the significance of the Designated Place including a description of the "place" during the period or periods for which it is being commemorated where the Designated Place and the place in historical times are not the same. Also may include information on the geographic relationship of the site to other sites both locally, nationally and internationally.

Historic place is defined in the *Historic Sites and Monuments Act* as "a site, building or other place of national historic interest or significance, and includes buildings or structures that are of national interest by reason of age or architectural design". Referred to as ***Designated Place*** in this *Guide* and *Guidelines*.

Historic Sites and Monuments Act describes the powers of the Minister with respect to the commemoration of historic places and outlines the role of the Historic Sites and Monuments Board of Canada.

Historic Sites and Monuments Board of Canada is an independent body that provides the Minister of Canadian Heritage with impartial and expert advice on matters relating to historical commemoration. Also referred to as the 'HSMBC'.

Historic value is a value or values assigned to a resource, whereby it is recognized as a cultural resource. These values can be physical and/or associative.

Intervention is any activity (including activities such as maintenance, repair, preservation, stabilization, restoration, or

rehabilitation) undertaken on a resource by those responsible for cultural resources.

National historic site has both a formal and an applied meaning. The formal meaning is identical to Designated Place, i.e., it refers to "historic place" as defined in the *Historic Sites and Monuments Act* or a place set aside as a national historic site under Section 42 of the *Canada National Parks Act*. The name is commonly used to refer to the area administered by Parks Canada, or another owner, as a national historic site

National Historic Site Program Objectives are the objectives of the Government of Canada for the national historic sites program:

- To foster knowledge and appreciation of Canada's past through a national program of historical commemoration.
- To ensure the commemorative integrity of national historic sites by protecting and presenting them for the benefit, education and enjoyment of this and future generations, in a manner that respects the significant and irreplaceable legacy represented by these places and their associated resources.
- To encourage and support owners of national historic sites in their efforts to ensure commemorative integrity.

Objects are moveable cultural property consisting of artifacts, made or used by people, and specimens, such as pollens recovered from archaeological investigation. Objects that have historic value within the meaning of the *Cultural Resource Management Policy* are cultural resources.

Presentation includes activities, services and facilities that bring the public into direct or indirect contact with national historic sites and the resources associated with them.

Reasons for designation as a national historic site are expressed as messages in the second element of the Commemorative Integrity Statement. They are derived from the Statement of Commemorative Intent.

Viewscape is a line-of-sight from a specific location to a landscape or portion of it. A ***viewshed*** refers to a sequence of views or panorama from a given vantage point.

Guideline No. 2

CRM Policy and the Commemorative Integrity Statement

The concept of commemorative integrity and the commemorative integrity statement (CIS) are rooted in Parks Canada's *Cultural Resource Management Policy*. Commemorative integrity is an expression of the *CRM Policy* as applied to a specific national historic site.

The following questions have been derived from the *CRM Policy* and can be used in several ways.

- Answers to the questions in 2.1 and 2.3 can be used to describe the property and its resources, values and messages when preparing a CIS.
- Answers to the questions in 2.2 and 2.4 provide advice to managers to ensure that a state of commemorative integrity exists at the national historic site. These questions refer to actions or conditions implicit in the CIS objectives.
- Answers to the questions in 2.2 and 2.4 also contain guidance on monitoring, essential to ensuring commemorative integrity.

	Describing CI	Ensuring CI	Monitoring CI
The Site and its Resources	2.1	2.2	2.2
Messages	2.3	2.4	2.4

2.1 Describing Commemorative Integrity: The Site and its Resources

- Were all resources given initial consideration as potential cultural resources?
- Have resources been inventoried and evaluated?
- Are the cultural resources related to the reasons for designation accorded the highest value?
- Are the cultural resources valued in their context?
- Are the cultural resources whose historic value derives from their connection to different periods in history valued for that evolution and not just for their existence at a single moment in time?
- Are the cultural resources which derive their historic value from the interaction of nature and human activities valued for both their cultural and natural qualities?
- Are the associative or symbolic qualities of the cultural resources dealt with as well as the physical qualities?
- Have the natural resources of the site been treated in accordance with the *CRM Policy* principles?
- Does the CIS adequately address the whole (the site) as well as its parts?

2.2 Ensuring Commemorative Integrity: The Site and its Resources

- Is the historic value of the cultural resources respected in accordance with the *CRM Policy* principles and practice? Are cultural resources managed in accordance with the *CRM Policy* principles and practice?
- Do management decisions and practices adequately address the whole (the site) as well as the parts?
- Have the *CRM Policy* principles and practice been applied to contracts, leases,

licenses, concessions or agreements that affect cultural resources?

- Are steps in place to ensure the continued survival of the cultural resources with minimum deterioration?
- Is there a program of conservation maintenance in place to mitigate wear and deterioration?
- Are records and inventories relating to cultural resources (including basic data, records of decisions and actions taken, heritage recording, &c.) up to date?
- Have modifications to the cultural resources been based on sound knowledge and respect for the historic value(s) of the resources?
- Does adequate research, recording, and investigation precede actions that affect cultural resources and their presentation?
- Have the potential consequences and cumulative impacts of proposed actions on the historic value of the cultural resources been considered?
- Has direct evidence been used instead of indirect evidence in conservation measures?
- Has the use of indirect evidence taken place in accordance with the *CRM Policy* principles and has the use of such evidence been clearly acknowledged?
- Have the least destructive and most reversible means been used to accomplish objectives?
- Have variances from the path of least intrusive action been justified and recorded?
- Are there uses or threats that reduce the potential for long-term conservation and future understanding and appreciation of the cultural resources? Have such uses or threats been discontinued or addressed?
- Is new work sensitive in form and scale (i.e., does not overwhelm) the site and its associated resources?
- Have research and the results of research been the basis for activities that have an impact on cultural resources and their presentation?
- Are monitoring and review systems in place to determine if conservation and presentation objectives are met effectively?
- Is the historic value/meaning of the site's cultural resources communicated?
- Is information about the cultural resources made available?
- Are the professional, technical and administrative activities, and the contributions of relevant disciplines effectively integrated into the site's management and operations? Does management place an emphasis on interdisciplinary teamwork?
- Is the site managed as a place of national historic significance to the whole nation, or it is managed primarily as an attraction?
- Do reconstructions or reproductions compromise the commemorative integrity of the site by overwhelming the reasons/resources integral to its designation of national significance?
- Have management planning activities been based on the commemorative objectives that led to the site's designation and acquisition?
- Has the historic value of the cultural resources been fully considered and integrated into the planning, conservation, presentation and operational programs?
- Have the planning activities flowed from policy objectives and adhered to policy principles?
- Do the *CRM Policy* principles form the basis for all public consultation?
- Do impact assessments consider and address the negative consequences of proposed actions on the historic value of cultural resources?

2.3 Describing Commemorative Integrity: Messages

- Are the messages consistent with the site's designation?
- Is the historic value of the historic site communicated?
- Is the historic value of cultural resources, which derive their importance from being part of a place or a site, communicated?
- Are statements about the past made without a basis in knowledge?
- Is respect for the historical evolution of cultural resources sacrificed for a moment-in-time interpretation?
- Is the continuum of meaning, ranging from national to local significance, communicated?
- Is the richness and diversity of the national historic sites system - including national historic sites administered by others - communicated?
- Are differing contemporary views, perspectives informed by traditional knowledge, and later interpretations presented?
- Is the past presented in a manner that accurately reflects the range and complexity of the human history commemorated or represented at the site?
- Does Parks Canada play the role of the arbiter of Canada's human history?
- Is a sense of shared responsibility for safeguarding these places of national historic significance passed on to the public?
- Does the site encourage research and study in Canadian history?

2.4 Ensuring Commemorative Integrity: Messages

- Is primary importance given to the reasons for designation?
- Are these messages overwhelmed by the communication of the site's other heritage messages?
- Does the public understand the reasons for the site's designation?
- Has direct evidence been used instead of indirect evidence in interpretation activities?
- Has the use of indirect evidence taken place in accordance with the *CRM Policy* principles? Has the use of such evidence been clearly acknowledged?
- Are the discrepancies in accuracy adequately acknowledged?
- Do depictions of the past without a basis in knowledge take place?
- Does presentation at the site focus on the whole as well as the parts that make up the whole?
- Do the means of presentation take into account the nature and interests of the public?
- Do the means of communication support or impede effective communication of the reasons for designation?
- Do the reconstructions or reproductions compromise the commemorative integrity of the site by overwhelming the reasons/resources integral to its designation of national significance?
- Are reproductions and reconstructions marked in such a way as not to be confused with the originals they are intended to represent?
- Is the past presented in a manner that accurately reflects the range and complexity of the human history commemorated at or represented at the site?
- Are differing contemporary views, perspectives informed by traditional knowledge, and later interpretations presented?

Guideline No. 3

Process, Roles and Approvals for Developing Commemorative Integrity Statements

3.1 Process

The process for developing a Commemorative Integrity Statement (CIS) will depend on whether a site is administered by Parks Canada or not. The material in sections 3.1 and 3.2 is specific to Parks Canada-administered sites. Sites not administered by Parks Canada which wish to develop a CIS suitable for approval by Parks Canada should contact the Director, System Development Branch, National Historic Sites Directorate at 819-953-9345 for further information. Section 3.3 addresses approval requirements for both sites administered by Parks Canada and those administered by others.

The process of developing a CIS can be considered in four stages:

- getting started.
- confirming the designation.
- preparing the CIS.
- recommendation and approval.

3.1.1 Getting Started

The schedule for production of a CIS is identified in field unit business plans. In the case of sites not administered by Parks Canada, the decision to do a CIS is at the discretion of the site owner.

The field unit, or the service centre on the request of the field unit, appoints the team that will develop the CIS.

Preparation of a commemorative integrity statement for a site involves a multi-disciplinary team of cultural resource management specialists. The team includes not only functional specialists (for example, historians, archaeologists, and planners) but also those who are knowledgeable about the site and representatives from the site's management and operations.

Representatives of Friends or co-operating associations, partners from the community, or other relevant organisations or individuals may be part of the CIS team.

A planner or cultural resource management specialist is often designated by the field unit to lead development of the CIS. This person provides the CIS workshop participants with appropriate background information.

The field unit may invite staff from the National Historic Sites Directorate to participate in a CIS exercise to provide functional expertise in history, archaeology, heritage presentation, architecture, or policy. As team members, functional staff are able to provide specialized cultural resource

Requests for workshop participation of National Historic Sites Directorate staff with policy expertise are managed on a priority basis. Consideration is given to:

- **the degree to which the CIS is expected to be precedent setting,**
- **its potential impact on policy,**
- **the intricacy of the policy issues,**
- **the complexity of the site, and**
- **the need for specialised functional expertise.**

management input based on their area of expertise but do not represent all functional areas of the National Historic Sites Directorate.

Employees in the National Historic Sites Directorate are available for consultation on issues arising throughout the CIS development process.

3.1.2 Confirming the Designation

A draft Statement of Commemorative Intent and Designated Place are prepared by the field unit or its designate in accordance with Guidelines No.6 - *Developing the Statement of Commemorative Intent* and Guideline No. 7 - *Designated Place* .

These statements are *not* established through negotiation. The HSMBC has appointed the Status of Designations Committee to resolve outstanding questions relating to designated place and commemorative intent.

Early confirmation of the Statement of Commemorative Intent and Designated Place are essential for the smooth development of the CIS.

The draft Statement of Commemorative Intent and Designated Place are sent to the System Development Branch for confirmation by the National Historic Sites Directorate.

Within an agreed-upon period of time, the results of this review are communicated to the team and, where required, a discussion takes place regarding a final version of the Statement of Commemorative Intent and Designated Place.

Occasionally the review of Statement of Commemorative Intent and Designated Place results in the identification of a need to refer the questions to the HSMBC for more guidance. Further information on returning to the HSMBC can be found in section 3.4 - *Referring Statement of Commemorative Intent and Designated Place to the HSMBC.*

3.1.3 Preparing the CIS

With the Statement of Commemorative Intent and Designated Place in hand, the full team meets and develops the CIS. This usually takes place during a workshop.

The draft CIS is then written by members of the team, reflecting both the discussions at the workshop and the direction outlined in this *Guide*. Often the draft is re-circulated to the team for comment.

The draft of the completed CIS is sent to the System Development Branch for review. Representatives of the history, archaeology, policy, heritage presentation, and system development branches, as well as members of the Heritage Conservation Program, review the draft in order to ensure that it is consistent with all relevant policies and direction, including the requirements contained in the *CIS Guide* and *Guidelines*.

Within an agreed-upon period of time, the results of this review are communicated to the team. There may be further discussion between National Historic Sites Directorate staff and members of the CIS team on issues raised by the review.

The final version of the CIS is prepared by members of the team.

The CIS should be grammatically correct and all information should be accurate. Once integrated into a management plan or posted on the Parks Canada web-site, the CIS

becomes a public document and must then meet associated official language and corporate identity standards.

3.1.4 Approval by the Field Unit Superintendent and the Director General

The CIS is approved by the Field Unit Superintendent and any other signatories in the field. The signed CIS is then submitted to the System Development Branch for approval by the Director General, National Historic Sites. The final CIS is verified against issues identified in the National Historic Sites Directorate review before it is forwarded to the Director General.

The approved CIS is returned to the field unit. Copies of the CIS are kept in the System Development Branch. A signed copy of the final CIS is also sent to the lead on the CIS team.

3.2 Roles

In developing the CIS, the field unit, service centre and National Historic Sites Directorate each have distinct roles and responsibilities (see box).

	Field Unit	Service Centre	National Historic Sites Directorate
Policy Development	• provide advice on the *CIS Guide* and *Guidelines*	• provide advice on the *CIS Guide* and *Guidelines*	• prepare the *CIS Guide* and *Guidelines*
Knowledge and Interpretation of Policy	• know the *CIS Guide* and *Guidelines*, including the latest changes • ensure there is appropriate expertise in place to complete the CIS in accordance with the *CIS Guide* and *Guidelines*	• know the *CIS Guide* and *Guidelines*, including the latest changes • provide policy advice and program information, as required	• provide policy advice and program direction, as required • provide guidance on submission to the HSMBC, if necessary
Training and Communication about Policy	• obtain policy and program direction, as required	• obtain policy and program direction, as required • provide expertise in planning and the use of the Guidelines	• communicate the content of the *CIS Guide* and *Guidelines* and subsequent up-dates
Policy Implementation	• identify a contact person for communicating with National Historic Sites Directorate • ensure that Statement of Commemorative Intent & Designated Place are in place before beginning the CIS exercise • leave enough time to return to the HSMBC, if necessary • prepare the CIS	• provide functional expertise and advice • assist the field unit and National Historic Sites Directorate as requested • may assume any of the field unit roles, at the request of the field unit	• may provide functional experts to the CIS team • identify a contact person for communicating with the field • provide advice from functional experts on specific issues
Policy Monitoring			• review and confirm draft Statement of Commemorative Intent and Designated Place • review draft CIS for compliance with *Guide*

3.3 Approval

On the signature page of the CIS, a signature block should be included for each person who is to sign the document.

The CIS ***must*** be approved by:
- the Site Superintendent, if one exists, and
- the Field Unit Superintendent, and
- the Director General, National Historic Sites, and
- in the case of sites not administered by Parks Canada, by the owners of the site or their representatives.

The CIS ***may*** be signed by representatives of:
- third party operators, or
- a shared management board, or
- other stakeholders involved in the preparation of the CIS.

Whether such parties should be signatories to the CIS is at the discretion of the Field Unit Superintendent.

3.3.1 At sites administered by Parks Canada:

The approval of the ***Field Unit Superintendent*** indicates that the CIS:
- is an accurate reflection of what constitutes a state of commemorative integrity at the site;
- was prepared in accordance with *CRM Policy* principles and practice and the *CIS Guide* and *Guidelines*;
- will be applied in the management of the site.

The approval of the ***Director General*** indicates that the CIS:
- is consistent with program direction and policy;
- conforms with the *CIS Guide* and *Guidelines*.

The signature of a representative of the site's ***Third Party Operator*** or ***Shared Management Board*** indicates that the CIS:
- was developed in consultation with them;
- will be applied in the management of the site.

The signatures of representatives of ***Stakeholder Groups*** indicate that the CIS:
- was developed in consultation with them.

3.3.2 At sites not administered by Parks Canada:

The approval of the ***Field Unit Superintendent*** indicates that the CIS:
- will guide the field unit in its relations with the national historic site.

The approval of the ***Director General*** indicates that the CIS:
- is consistent with program direction and policy;
- conforms with the *CIS Guide* and *Guidelines*.

The approval of the ***Owner*** or operator indicates that the CIS:
- is an accurate reflection of what constitutes a state of commemorative integrity at the site;
- was prepared in accordance with the *CIS Guide* and *Guidelines*;
- will be applied in the management of the site.

3.4 Referring Statement of Commemorative Intent and Designated Place to the HSMBC

A reference to the HSMBC is warranted under the following circumstances:
- when commemorative intent cannot be determined with assurance from the

HSMBC minutes or plaque text.

- when Designated Place cannot be inferred with assurance from the HSMBC minutes in accordance with the HSMBC guidelines on determining Designated Place.
- when some aspect of the designation which has an impact on Statement of Commemorative Intent or Designated Place is factually wrong.
- when the site's status as a NHS is not clear in the minutes (national historic significance is not stated, or the category of designation – site, person or event – is unclear) and national historic site status is not conferred by other means (for example, having been set aside under Section 42 of the *Canada National Parks Act*). Depending on circumstances, this may need to be treated as a new submission.

These questions will normally be considered by the Status of Designations Committee of the HSMBC.

When the Statement of Commemorative Intent can be inferred with assurance from the HSMBC minutes or plaque text, and Designated Place can be derived from the approved minutes, they stand until altered by a subsequent approved recommendation of the HSMBC. Changes to the Statement of Commemorative Intent or Designated Place can be proposed to the HSMBC and will be dealt with in accordance with HSMBC priorities and workload.

In cases where substantial additions or changes to an existing designation are desired, it will be necessary to make a formal submission for a new designation to the full HSMBC.

The decision to refer to the HSMBC is taken following the review of the draft Statement of Commemorative Intent and Designated Place by National Historic Sites Directorate staff. In questions of Designated Place, the site owner must also be consulted.

Once the decision to refer to the HSMBC has been taken, the field unit contacts the Executive Secretary of the HSMBC to initiate the process of bringing the question to the HSMBC. The field unit, service centre, Executive Secretary, and either Historical Services or Archaeological Services Branch in the National Historic Sites Directorate will then confer on the exact question to be put to the HSMBC and the timing of the submission. This group will also determine who will write the submission and co-ordinate vetting of the draft report.

The submission to the Status of Designations Committee should follow the approved report form and be vetted by members of the CIS team and functional experts at National Historic Sites Directorate who were involved in identifying the need for clarification. All reports to the HSMBC require the support of the appropriate Director (either Historical Services or Archaeological Services).

The HSMBC meets only twice a year and has a heavy agenda. It may therefore be many months before it can consider issues relating to commemorative intent or Designated Place. Depending on the complexity of the issues involved, work on the CIS may continue while awaiting the HSMBC's determination. In all cases, however, the CIS can not be approved if issues relating to commemorative intent or Designated Place remain unresolved.

Guideline No. 4

Templates

4.1 Format for CISs

Note - The section numbers in this template are for purposes of the template. Related section of the *Guide* and *Guidelines* are in [square brackets].

Cover Page - containing correct site name, location, date prepared and identifying document as a Commemorative Integrity Statement.

Signature Page - containing signatures of the Field Unit Superintendent and the Director General, National Historic Sites, as a minimum. [Guideline No. 3, section 3.3]

1.0 Introduction [*Guide*, section 2.1]
- **1.1 Overview** [2.1.1]
- **1.2 National Historic Sites Program Objectives** [2.1.2]
- **1.3 Commemorative Integrity** [2.1.3]
  - 1.3.1 Definition of Commemorative Integrity
  - 1.3.2 Definition and Purpose of the Commemorative Integrity Statement
  - 1.3.3 Uses of the Commemorative Integrity Statement [1.3]
- **1.4 *Cultural Resource Management (CRM) Policy*** [2.1.4]

2.0 Designation and Context [2.2]
- **2.1 Designation** [2.2.1]
- **2.2 Commemorative Intent** [2.2.2]
  - 2.2.1 Definition [2.2.2.1]
  - 2.2.2 Statement of Commemorative Intent for XY National Historic Site of Canada [2.2.2.2]
- **2.3 Designated Place** [2.2.3]
  - 2.3.1 Definition [2.2.3.1]
  - 2.3.2 Description of Designated Place [2.2.3.2]
- **2.4 Historic and Geographic Context** [2.2.4]
  - 2.4.1 Historic Context [2.2.4.1]
  - 2.4.2 Geographic Context [2.2.4.2]

3.0 Resources Directly Related to the Reasons for Designation as a National Historic Site [2.3]
- **3.1 Designated Place**
  - 3.1.1 Description [2.2.3.1]
  - 3.1.2 Historic Values [2.3.2]
- **3.2 Landscapes and Landscape Features**
  - 3.2.1 Description
  - 3.2.2 Historic values [2.3.2]
- **3.3 Buildings and Structures**
  - 3.3.1 Description
  - 3.3.2 Historic Values [2.3.2]
- **3.4 Archaeological Sites**
  - 3.4.1 Description
  - 3.4.2 Historic values [2.3.2]
- **3.5 Objects**
  - 3.5.1 Description
  - 3.5.2 Historic values [2.3.2]
- **3.6 Objectives** [2.3.3]

4.0 Effective Communication of the Reasons for Designation as a National Historic Site [2.4]
- **4.1 Reasons for Designation as a National Historic Site** [2.4.1]
  - 4.1.1 Definition [2.4.1.1]
  - 4.1.2 Reasons for Designation [2.4.1.2]
- **4.2 Context Messages** [2.4.2]
  - 4.2.1 Definition [2.4.2.1]
  - 4.2.2 Context Messages [2.4.2.2 & 2.4.2.3]
- **4.3 Objectives** [2.4.3]

5.0 Resources, Values and Messages Not Related to the Reasons for Designation as a National Historic Site [2.5]
- **5.1 Resources Not Related to the Reasons for Designation as a National Historic Site** [2.5.1.1]
- **5.2 Values Not Related to the Reasons for Designation as a National Historic Site** [2.5.1.2]
- **5.3 Objectives for Resources and Values** [2.5.1.3]
- **5.4 Messages Not Related to the Reasons for Designation as a National Historic Site** [2.5.2]
- **5.5 Objectives for Messages** [2.5.2.1]

6.0 Appendices [2.6]
- **6.1 HSMBC Minutes and Plaque Texts**
- **6.2 Map of the National Historic Site**
- **6.3 List of CIS Team Members**

4.2 Sample Signature Page

NORTH PACIFIC CANNERY
NATIONAL HISTORIC SITE OF CANADA

Commemorative Integrity Statement

Approved:

Christina Cameron, Director General DATE
National Historic Sites
Parks Canada

Steve Langdon, Field Unit Superintendent
Gwaii Haanas Field Unit
Parks Canada

Herb Pond, Executive Director,
North Pacific Cannery Village Museum

JANUARY 2000

Guideline No. 5

Frequently Asked Questions

1. How does a national historic site get designated?

A national historic site is a place that has been designated to be of national historic interest or significance by the Minister responsible for the *Historic Sites and Monuments Act*. The Minister usually acts on the advice of the Historic Sites and Monuments Board of Canada. This advice is typically communicated to the Minister in the form of recommendations in the HSMBC's minutes.

However, over the years there have been a number of other ways in which national historic sites have been designated:

- places set aside under Part II of the *National Parks Act* (now section 42 of the *Canada National Parks Act*) are national historic sites. Many of these have also been recommended for designation by the HSMBC.
- places declared to be national historic sites in a formal Parliamentary statement by the Minister responsible for the *Historic Sites and Monuments Act*. An example of this is the designation of the *S.S. Keno* which was also subsequently recommended by the HSMBC.
- places explicitly referred to as national historic sites in legal agreements signed by the Minister responsible for the *Historic Sites and Monuments Act*. Included in this category are places like Marconi NHSC.
- places formally dedicated as national historic sites by the Prime Minister. Laurier House NHSC in Ottawa is an example in this category.

Acquisition of property using the *Historic Sites and Monuments Act* as the authority is not sufficient justification for the property to be included in the list of national historic sites. Parks Canada has acquired property for locating cairns for plaques, for operational purposes and for other program needs - none of which, on its own, is sufficient justification for including the property in the list of national historic sites.

2. What's the difference between 'commemorative integrity' and a 'Commemorative Integrity Statement (CIS)'?

'Commemorative integrity' refers to the condition of a national historic site and describes a state of health and wholeness. A 'CIS' is a document outlining what is meant by commemorative integrity for a particular national historic site. See Guideline No. 1 - *Glossary*.

3. Can a CIS be done for more than one site at a time?

As a general rule, each national historic site should have its own CIS. However, when the HSMBC designation is such that two or more national historic sites constitute a "whole" for the purposes of commemoration, a CIS for the group may be warranted.

For example, the CIS for Prince of Wales Fort NHSC includes Sloops Cove NHSC and Cape Merry NHSC, which, although

separately designated, were considered by the HSMBC as a whole. When multiple national historic sites are included in a single CIS, it should be clear what the Statement of Commemorative Intent and Designated Place are for each designated site.

In some cases, the CISs for several sites have been included in a single volume. For example, the CISs for Port-Royal, Fort Anne, Grand-Pré, and Fort Edward were produced and approved in a single package.

4. To what extent should third parties be involved in the development of the CIS?

In cases where a national historic site is owned or operated by a third party, representatives of this group play an essential role in achieving commemorative integrity for the site. In their capacity as owner or as site operator, they are responsible for the management and operation of the site and for the preparation of a CIS.

In cases where the site is owned and operated by Parks Canada, community representatives and other stakeholders should be included in the development of the CIS to build understanding of commemorative integrity for the site, to enhance shared stewardship and to ensure broader input into the Resources, Values and Messages Not Related to the Reasons for Designation section of the CIS.

5. Can submission reports be used in preparing a CIS?

A submission report (formerly known as an agenda paper) is any research document prepared for the HSMBC's consideration. Over the years these have been prepared by HSMBC members, by third parties, and by Parks Canada staff. These documents are input to the HSMBC rather than an expression of the HSMBC's opinion.

Submission reports and agenda papers are not to be used directly in preparing a description of the Designated Place or the Statement of Commemorative Intent, except where the HSMBC's minutes make explicit reference to specific content in these documents. In preparing a CIS, probably the most important use of these documents is in providing historical information on the site.

6. Does the Statement of Commemorative Intent determine the size of the Designated Place?

No. The Designated Place is the place that has been designated by the Minister. For example, Hay River Mission Sites is a national historic site because of its close association with a critical period in Dene/Euro-Canadian relations, but the Designated Place consists of St. Peter's Anglican Church, St. Anne's Roman Catholic Church and Rectory, and the two church cemeteries with their numerous spirit houses. Other places associated with Dene/Euro-Canadian relations in Hay River Mission are not part of the Designated Place.

In cases where the team preparing the CIS feels that the Designated Place or Statement of Commemorative Intent (as described in HSMBC documents) needs to be changed, the matter should be discussed with the National Office as part of the review prior to preparing the CIS.

7. How much latitude is there in

"interpreting" a HSMBC recommendation for purposes of determining Designated Place?

The HSMBC's recommendation means what it says. The HSMBC has also approved guidelines for interpreting Designated Place from old HSMBC minutes (see Guideline No. 7). These guidelines, which will be expanded in the next few years, explain how minutes should be used.

There is no flexibility in interpreting recommendations beyond what the minute itself says, in the context of the approved HSMBC guidelines. In cases where the minute is not explicit and the guidelines cannot be applied, the question of Designated Place must be referred back to the HSMBC.

8. What is the relationship between a national historic site and the Designated Place? Are they the same?

The formal meaning of national historic site is identical to Designated Place, i.e., it refers to "historic place" as defined in the *Historic Sites and Monuments Act*. National historic site is also sometimes used to describe the administered entity, which may contain all or part of the Designated Place.

For example, in common usage Fort Walsh NHSC is used to describe the property Parks Canada administers at Fort Walsh. The Designated Place is considerably smaller than the administered property. Ryan Premises NHSC is also used to describe the property Parks Canada administers but in this case it is smaller than the Designated Place.

9. Should the CIS be done for the Designated Place or for the administered entity?

A CIS should encompass the larger of the two. If the Designated Place is larger than the administered entity, such as at Ryan Premises NHSC, the CIS should deal with the administered entity plus those parts of the Designated Place which extend beyond the administered boundaries. If the administered property is larger than the Designated Place, which is the more usual situation, then the CIS should deal with the administered entity.

There are a few instances where the administered entity is so large and complex it overwhelms the Designated Place. Where this occurs, the CIS may deal with an area smaller than the administered entity but encompassing at least the whole of the Designated Place. In all cases, the whole of the Designated Place must be included in the CIS.

10. Who determines Designated Place and commemorative intent? What role do stakeholders have in preparing the description of Designated Place and the Statement of Commemorative Intent?

Designated Place and commemorative intent are established by the Minister as specified in the *Historic Sites and Monuments Act*, usually on the advice of the HSMBC.

Owners of national historic sites and other stakeholders are often intensely interested in what was designated and the reasons for the site's designation. However, stakeholder input into this decision-making process takes place *before* sites are designated - when the site is submitted (usually by the

owner or with the owner's consent) or when the submission report/agenda paper is prepared (sometimes in consultation with stakeholders, especially Aboriginal peoples and cultural communities).

If owners or stakeholders have changes to suggest in the description of Designated Place or Statement of Commemorative Intent, the alterations need to be recommended by the HSMBC and approved by the Minister before they can be integrated into the CIS. See also Guideline No. 3, section 3.4.

11. Where persons and/or events are commemorated at national historic sites, are these designations part of the commemorative intent for the site?

Persons, events and other designations can be part of the commemorative intent for a site if the HSMBC minute indicates this. For example, the place where Treaty No. 1 was made (an event which occurred at Lower Fort Garry) is part of the commemorative intent for the site because this event was identified in the HSMBC minutes as a reason for designation for Lower Fort Garry.

Where an event is associated with a place which has been designated as a national historic site, that event is *not* automatically part of the commemorative intent. For example, Dr. Frédérick Montizambert is a national historic person (designated 1998) because the reformed quarantine system, based on his work at Grosse-Ile, ushered in a new era of efficiency, effectiveness and comfort. The HSMBC recommended Dr. Montizambert be commemorated by a plaque at Grosse-Ile and the Irish Memorial. Grosse-Ile was designated in part to commemorate the role played by the island from 1832 to 1937 as the quarantine station for the port of Quebec, for years the principal point of entry for immigrants to Canada. No reference was made to Dr. Montizambert in the minutes recommending Grosse-Ile and the Irish Memorial as a site of national historic significance.

Accordingly, the Statement of Commemorative Intent for Grosse-Ile and the Irish Memorial NHSC would not include any reference to Dr. Montizambert as part of the reasons for its designation. However, the CIS should contain a reference to the other designation(s) in the section entitled "Historical and Geographical Context", as well as at the end of the section containing the Statement of Commemorative Intent.

Following the Statement of Commemorative Intent, there should be a statement such as: While not part of the commemorative intent for Grosse-Ile and the Irish Memorial NHSC, Dr. Frédérick Montizambert is a national historic person and is commemorated by an HSMBC plaque at the site.

12. Can the Designated Place be changed if part of it is destroyed?

Because the Designated Place refers to the place designated by the Minister of Canadian Heritage on the recommendation of the HSMBC, it can only be changed by the Minister.

In instances where the resources which are part of the Designated Place have been destroyed or diminished in value, reconsideration by the HSMBC may result in a recommendation to the Minister to

amend the designation. Similarly, new research or the discovery of new resources may warrant a reconsideration by the HSMBC of commemorative intent or Designated Place.

13. In some cases, a national historic site may be part of another larger national historic site. Province House NHSC in Charlottetown, which also forms part of Great George Street NHSC in Charlottetown, is a good example of this. What impact does this situation have on the Statement of Commemorative Intent and the description of Designated Place for each site?

In both cases, the Statement of Commemorative Intent and Designated Place would be derived in the same manner as for other national historic sites. The only time when a Statement of Commemorative Intent would contain a reference to the other national historic site would be when the HSMBC recommendation states that being part of that other national historic site constitutes a reason for designation. However, immediately following the Statement of Commemorative Intent, there should be a statement such as the following:

"Province House NHSC forms a part of Great George Street NHSC, which was designated for its ... in 1966," or conversely, "It should be noted that Great George Street NHSC contains Province House NHSC, which was designated because of its ... in 1990."

14. How are commemorative intent and Designated Place described in recommendations to the Minister?

The system changed in June 1999. Commemorative intent and the extent of Designated Place are now clearly stated in the HSMBC recommendation to the Minister.

15. In those rare cases where a national historic site designation was revoked, and the site was subsequently re-designated, what use can be made of the HSMBC recommendation(s) and plaque text(s) that preceded the de-designation?

A revocation rescinds all previous recommendations. If these sites are later brought forward for reconsideration and subsequently recommended by the HSMBC, the Statement of Commemorative Intent and Designated Place should be drawn from minutes and plaque texts relating only to the later recommendation(s).

16. Is there any difference in the use of HSMBC recommendations where the site was recommended for both its historic and architectural significance, just for its historic significance or just for its architectural significance?

Before 1957, the HSMBC's recommendations for national significance relate exclusively to a site's national *historic* significance. Beginning in 1957, there may also be reference to a site's *architectural* importance.

Recommendations in the 1960s, 1970s and 1980s contained references to a site's national significance for historic and architectural reasons, just for historic reasons or sometimes just for architectural reasons.

Where a site is designated for its architectural significance, the Statement of Commemorative Intent normally contains a statement relating to the site's architecture. By the same token, the Statement of Commemorative Intent for a site designated for its historic significance typically contains a statement relating to the site's history. Sites designated for both historic and architectural significance usually contain at least two statements (one relating to history and one to architecture) in the Statement of Commemorative Intent.

By 1998, because there is nothing in the *Historic Sites and Monuments Act* referring specifically to national architectural significance, the HSMBC's recommendations had reverted once again to being for national historic significance. However, the reasons for designation are clearly articulated and may include references to architecture.

17. How should "oral traditions" be treated in a CIS, as a cultural resource or as a significant value?

A cultural resource is a human work, or a place which gives evidence of human activity or has spiritual or cultural meaning, and which has been determined to have historic value. Generally speaking, the term cultural resource refers to a physical resource. Non-physical or intangible heritage, such as oral traditions, folklore, beliefs (sacred and secular), customs, and language is not normally described in a CIS as a cultural resource but as a value of the site.

However, where a site designation makes specific reference to intangibles as a resource, these should be treated as cultural resources in the CIS. When a site is designated because of its association with a particular group and that group wishes to record a non-physical expression as a cultural resource, it should be recorded as a cultural resource in the CIS.

18. Can trees and plants be evaluated as cultural resources?

Trees and plants can be evaluated as cultural resources where they have historic value. For example, a Culturally Modified Tree or CMT (a tree that has been altered, often by native people as part of their traditional use of the forest) would be a cultural resource if it were deemed to have historic value.

The tulip tree at Woodside NHSC has been deemed to have historic value (and thus evaluated as a cultural resource) due to the direct references made by Mackenzie King concerning the important association of the tree to his father who planted it. The Woodside CIS includes it as a resource directly related to the reasons for designation as a national historic site because of its direct association with Mackenzie King.

On the other hand, a red oak tree which existed during Macdonald's tenure at Bellevue House in Kingston has not been documented as having the same direct association with Macdonald. If the team preparing the Bellevue House CIS considered it to have historic value it would be a resource not related to the reasons for designation as a national historic site. Section 1.1.7 of the *CRM Policy* provides guidance on how to consider natural resources.

19. Are the records associated with

cultural resources (for example, archaeological records, records of building interventions, artifact records) also cultural resources?

No, they are not automatically cultural resources. Section 1.3.3 of the *CRM Policy* states that "information about cultural resources will be recorded and those records will be maintained for the future. Parks Canada will maintain up-to-date inventories and records on its cultural resources. Dossiers will contain basic data and related documentation, including the results of research and evaluation, records of decision and actions taken. Heritage recording will be carried out on cultural resources of national historic significance."

While these records are an integral part of understanding the resource, their association with a cultural resource does not automatically make them cultural resources. Records associated with cultural resources are not considered to be cultural resources unless the records themselves have been evaluated and determined to have historic value. If the record is important for its information value only (i.e. not for its physical form), it is not a cultural resource.

20. How do we treat viewscapes or viewsheds?

A viewscape or viewshed is normally considered to be a value associated with a resource or resources.

21. Is a cultural landscape a cultural resource?

The use of the word *cultural* juxtaposed to *landscape* has caused confusion as to whether it is a cultural resource. A cultural landscape is like any other resource - it should be evaluated. If a cultural landscape has historic value then it is a cultural resource.

22. Should moveable cultural resources which do not belong to the owner of the national historic site be included as part of the CIS? For example, should archival material relating to the site's commemorative intent be included as part of the CIS even though the material is housed in the National Archives?

The concept of commemorative integrity and the CIS were developed primarily to assist managers/owners in managing the cultural resources located at national historic sites.

In most cases the cultural resources, whether directly related to the reasons for designation as a national historic site or not, will be part of the administered entity or located at the site. There may be some instances where the CIS should include additional cultural resources which are beyond the administered entity, for example where resources directly related to the reasons for designation are under the custody of the owner of the site but are in storage at another location.

In each case, the CIS should not only identify the resource, but also the historic values and specific objectives which the owner/manager of the site is responsible for achieving.

23. In determining if something is a cultural resource and, if so, whether it is directly related to the reasons for designation as a national historic site,

how is resource evaluation affected when the HSMBC has singled out specific features as being nationally significant (e.g., specific structures at the Sault Ste. Marie Canal or the Hay River Mission Sites)?

In most cases the HSMBC has not provided specific direction as to which cultural resources are of national historic significance. However, there are some instances, for example with certain canals, where the HSMBC clearly considered the resources associated with a site and indicated which *in situ* resources were considered to be of national historic significance.

For sites where this has been done, we must respect the recommendation of the HSMBC, given its authority under the *Historic Sites and Monuments Act*, and not expand on the list of *in situ* resources directly related to the reasons for designation.

24. Can *in situ* resources outside the Designated Place be considered as resources directly related to the reasons for designation as a national historic site?

In situ resources outside the Designated Place but within the administered property can be identified as directly related to the reasons for designation as a national historic site provided they relate directly to commemorative intent. *In situ* resources outside the administered property cannot be evaluated as directly related to the reasons for designation as a national historic site. Otherwise, the designation of a single site because of its association with the War of 1812, for example, would result in an impossible situation where all resources, regardless of location, associated with the War of 1812, would be considered as resources directly related to the reasons for designation.

There are some cases where the HSMBC has referred to *in situ* resources outside the Designated Place as contributing to the national significance of a site. For example, the Designated Place for the Ruin of St. Raphael's Church is the ruin but the HSMBC's recommendations also make reference to the importance of its ecclesiastical precinct as contributing to the significance of the ruin. In instances such as this, the resources specifically referred to by the HSMBC will be considered as directly related to the reasons for designation.

In cases where the HSMBC has identified the resources that are nationally significant or which contribute directly to national significance, only those resources are evaluated as directly related to the reasons for designation as a national historic site. Anything not mentioned is not directly related to the reasons for designation as a national historic site.

25 Can we use the following criterion, "the original material, form and functional design qualities are safeguarded", as an objective?

Only if historic value (including historic value not related to national significance) resides exclusively in the original, which is exceedingly rare.

26. Should HSMBC plaques be treated as resources not related to the reasons for designation as a national historic site?

Section 2.2 of the *CRM Policy* states that "ministerial plaques and monuments will be managed in accordance with this policy." This includes appropriate maintenance and conservation procedures as well as appropriate storage once a plaque is no longer suitable for display.

There may be instances where a plaque does not need to be treated as a cultural resource. For example:

- when it was not erected (or erected and replaced within 5 years) because of errors in the plaque text;
- when it was vandalized beyond repair and was replaced by a plaque of the same style with the same text.

27. Shouldn't "antiques" be evaluated as cultural resources?

If "antiques" have historic value they should be evaluated as cultural resources. Historic value is not derived through age alone but through attributes which can be either physical or associative.

For example, the tea service used by Mackenzie King when he lived at Laurier House would be considered a resource directly related to the reasons for designation because of its association with King. A physically identical tea service acquired through an antiques dealer to be used as part of a display at Laurier House will have monetary value. However, to be evaluated as a cultural resource it must also have historic value.

28. What about "collections" which are housed at various historic sites; should they be evaluated as "collections" or as individual objects?

In general, objects should be evaluated on an individual basis as objects, not as collections. However, there are some collections, such as the Webster Collection at Fort Beauséjour, which may be deemed to have historic value as collections. In these cases, the objects may have historic value individually as well as having value from being part of a collection.

29. What obligations relative to Federal Heritage Buildings should be identified in the CIS?

Classified or Recognized Federal Heritage Buildings are buildings administered by the federal government which have been evaluated and designated because of their significant heritage values. The Federal Heritage Buildings Review Office (FHBRO) has its own criteria for determining whether a building merits designation and a Code of Practice to guide treatment of these buildings. The Heritage Character Statement identifies what qualities led to the designation of the building and provides some guidance on how to protect the building's heritage character.

The site's management plan should account for all the management policies under which decisions about a site are made and is the appropriate place for discussion of obligations under the *Treasury Board Heritage Buildings Policy*. The *CRM Policy* requires that cultural resources (all classified or recognized Federal Heritage Buildings are cultural resources) must be safeguarded and their historic value(s) communicated.

Because the criteria for recognition under FHBRO may be unrelated to the reasons for designation, the Heritage Character Statement and Code of Practice *per se*

should not be cited in the CIS. The CIS gives guidance on managing a site based on commemorative integrity and the *CRM Policy*. Values cited in the Heritage Character Statement which do not relate to commemorative intent should, however, be acknowledged as values not directly related to the reasons for designation in the CIS, as should the FHBRO designation itself.

Guideline No. 6

Developing the Statement of Commemorative Intent

6.0 Commemorative Intent

Each CIS contains a Statement of Commemorative Intent (SOCI). The SOCI provides the answer to the question: why was this place designated as a national historic site?

6.1 Guidelines for the Preparation of the SOCI

Documentation for the SOCI is derived from the records of the Historic Sites and Monuments Board of Canada. The HSMBC minutes typically contain the following information:

1. Chairman's Report
2. Secretary's Report
3. Committee Reports
4. Recommendations
5. Narrative discussion pertaining to the recommendations
6. In addition, there are the approved plaque texts, many of which are contained in the Minutes.

Only items 4-6 are used to develop the SOCI.

6.1.1 Hierarchy of information

The hierarchy of information to be used to determine the reasons for designation of a site is as follows:

1a. recommendation(s) for national significance, including recommendations for cost sharing that contain an explicit reference to reason(s) for national significance;

1b. explicit references to "national significance" or "national importance" in an approved plaque text;

2. record of discussion in HSMBC minutes which may precede or follow the HSMBC's recommendation;
3. HSMBC recommendations for what should be in the plaque text;
4. approved plaque texts used to clarify HSMBC minutes;
5. approved plaque texts, where the plaque has been erected or the text has been approved within the previous five years;
6. HSMBC recommendations for interpretive programming.

Beginning at the first level (1a and 1b) in the hierarchy, if reasons for designation are found, it is not necessary to go further down the list to prepare a site's SOCI. Section 6.2 contains more details on the hierarchy.

6.1.2 Use the words of the HSMBC

The reasons for designation should be expressed using the words and phrases in the HSMBC minutes and approved plaque texts in a way which remains faithful to the HSMBC's intent. Adjustments may be made in some cases, e.g. First Nation for Indian tribe, pre-contact for pre-historic.

If the translation of the HSMBC minutes from English to French or *vice versa* is poorly done, the translation can be adjusted in the preparation of the SOCI but it must remain faithful to the other official language. Because plaque texts are approved by the

HSMBC in both official languages (and sometimes in a third language), the text must not be re-translated.

6.1.3 Succinct and non-repetitive

The reasons for designation should be written in a succinct and non-repetitive way, providing sufficient information for the reader to understand the reasons for designation but going no further. The reasons should be distinct from each other.

6.1.4 Format for the SOCI

In order to ensure that the SOCI presents the necessary information in a consistent manner, it is to be prepared as follows:

XY was designated a national historic site in (give year). The reasons for designation, as derived from the (give year) HSMBC minutes or the (give year) plaque text, are:

- *it served as ...*
- *it became ...*
- *it was associated with ...*

Where the reasons for designation are derived from references which originate in different years, the format in the following example should be used:

Fort Livingstone was designated a national historic site in 1923. The reasons for designation, as derived from the 1924 and 1963 plaque texts, respectively, are:

- ***it was the first capital of the Northwest Territories, 1876-1877.***
- ***it was the original headquarters and first post built specifically for the North-West Mounted Police.***

6.1.5 Reference to historic and architectural importance

The HSMBC's early recommendations for national significance refer almost exclusively to a site's national historic significance. In the mid-1950s the definition of "historic place" in the *Historic Sites and Monuments Act* was amended to include "buildings or structures that are of national interest by reason of age or architectural design." Beginning in the 1950s and continuing until 1997 recommendations variously referred to historical and architectural significance, historical significance or architectural significance.

Where a site is designated as being of historic and architectural significance, it is reasonable to anticipate that the SOCI will contain at least two reasons for designation, one relating to its historic importance, the other to its architectural importance. Where information on historic or architectural importance is not available from the HSMBC minute or plaque text, it may be necessary to seek clarification from the HSMBC.

In some cases the historical reasons are not particularly clear and the SOCI may provide a single reason which incorporates both historical and architectural significance:

- *St. George's Church (Halifax)* - This site was recognized as being of both architectural and historic significance. The site was designated because:
  - it illustrates a refined but rare aspect, dating to 1800, of the Palladian architectural style.

- *St. John's (Stone) Church (Saint John)* - This site was recognized on both counts. The site was designated because:
  - it is one of the earliest and best examples of a Gothic Revival church, in the Romantic phase, in Canada.

In both cases, historical was interpreted to mean by reason of age - "dating to 1800," and "one of the earliest examples."

6.1.6 Reference to architectural importance

Beginning in the late 1950s and increasingly in the 1960s, the HSMBC began to make reference to a site's architectural importance with or without reference to the reasons for its historic importance. These designations increased in the 1970s and 1980s as a result of building type and style studies prepared for the HSMBC.

The examples, below, illustrate a designation arising out of a building-type study, one arising out of a style study and a designation for architectural reasons which was independent of any building type or style study:

- *Elora Drill Shed.* This was designated as a result of the study on the architecture of the drill shed in Canada, a building type study out of which came a series of designations in 1989. The minutes note that "*those recommended for designation ... would in most cases be seen to be good representative examples of an important historical phenomenon rather than structures of great intrinsic merit.*" The HSMBC recommended the Elora Drill Shed as an example "*from the first stage in the evolution of the Canadian Drill Hall (1863 to 1871).*" The plaque text for the drill shed makes reference to "*this handsome stone structure, built in 1865, represents the earliest phase of drill hall construction in Canada*" which repeats the reason for designation.

- *St. Paul's Roman Catholic Church* (North Vancouver) was designated in 1980 as being of national historic significance. After its original designation on historical grounds, St. Paul's was considered as part of the Gothic Revival style study in 1990 and designated as a nationally significant example of the "*Gothic Revival Style in Canada.*" Accordingly the SOCI would recognize the architectural style as being one reason for designation.

- *Trestler House.* The May 1969 HSMBC minutes state that Trestler House "*is of national architectural importance.*" The plaque for the site states "*It is a fine example of traditional Quebec architecture, with its slightly extended eaves, its walls of quarried rubble and many chimneys and openings.*"

6.2 The Hierarchy of Information

6.2.1a Recommendations for national significance

Ministerially-approved recommendations of the HSMBC are assigned the highest priority. Recommendations were not formally approved as a matter of course by the Minister until the passage of the *Historic Sites and Monuments Act* of 1953. Pre-1953 HSMBC deliberations were not framed as recommendations but rather as "moved" and "carried". These have been accepted as designations unless explicitly rejected by the Minister or senior departmental officials.

6.2.1b Using references to national importance / national significance in plaque texts

A few plaque texts[1] make explicit reference

[1] A searchable database of about 500 approved plaque texts (most also erected) was established to search for references to "significance," "importance," "important," etc. The database is available through Parks Canada's intranet connection at <pks-isys>. The database does not include all sites, and contains no people or events. Work on the database is on-

to the reasons for designation:

- *St. Anne's Church* (Toronto) *"St. Anne's vibrant wall paintings make this church a place of national historic significance."*

- *Temple of the Church of Jesus Christ of Latter-Day Saints "A striking modern building dominating Canada's first Mormon settlement, the Alberta Temple is an architectural and historical monument of national significance."*

In these cases, the reference to national importance or national significance in the plaque text can be used in the SOCI.

References to "important" or "significant" in a plaque text can not be used to determine commemorative intent if the modifier "national" is missing.

6.2.2 Using the record of discussion
HSMBC Minutes frequently contain a record of the HSMBC's discussion relating to the subject being considered for designation. This discussion may precede or follow the recommendation itself. In the absence of reasons cited as discussed in 6.2.1, commemorative intent may be gleaned from the record of discussion.

6.2.3 Using references in the HSMBC minutes to what should be included in the plaque text
References to what is to be included in plaque texts should be used only when the minutes do not clearly articulate commemorative intent for the site. For example:

- *Banff Park Museum* In the 1985 minutes, the HSMBC recommended that:

"the Banff Museum is of national historic significance and should be commemorated by means of a plaque. Further, while the Board felt that the plaque should make some reference to the building's architectural style, so characteristic of early federal buildings in Rocky Mountain Park, it requested that the inscription emphasize the role played by Norman Bethune Sanson in the development of this "museum of museums" which so effectively illustrates an early approach to the interpretation of natural history in Canada."

Since there are no other references to national significance for the Banff Park Museum, the Banff Park Museum was designated because of its architectural style and because of its importance as a "museum of museums," illustrating an early approach to the interpretation of natural history in Canada, developed by Norman Bethune Sanson.

- *Metropolitan Theatre* and *Capitol Theatre* (Winnipeg) HSMBC minutes for June 1991 record the recommendation for the Metropolitan Theatre:

The Metropolitan (Allen) Theatre and the Capitol Theatre, fine examples, respectively, of the work of prominent American theatre architects C. Howard Crane and Thomas Lamb, are of national historic and architectural significance and should each be commemorated by means of a plaque, the texts of which, while making brief reference to the Theatres' architecture and cultural impact, should focus on the corporate struggle between the Allen and Famous Players Theatre chains for supremacy in the film distribution industry in Canada.

Here there are three reasons for designation: the architects and architecture, the theatre's cultural

---

going.

impact, and the corporate struggle between the chains.

The example below illustrates an instance where references to plaque text do not form part of the site's commemorative intent:

- *Marysville District* The March 1994 HSMBC minutes make reference to five reasons for the district's designation. The minutes later note that "*the Board suggested that the plaque inscription for the Marysville historic district make reference to the architectural firm which appears to have been responsible for the design of all extant elements.*"

6.2.4 Use of plaque texts to clarify the HSMBC's recommendation from the minutes

In a small number of cases, plaque texts can be used when the reasons for designation are only cryptically referred to in the HSMBC recommendation:

- *St. Paul's Roman Catholic Church* (North Vancouver) The June 1980 minutes state that "*St. Paul's Roman Catholic Church is of national historic significance, for social reasons.*" Because the social reasons are not stated in the minutes, it would be reasonable to draw the relevant information from the plaque text.

- *Skoki Ski Lodge* In the October 1992 minutes there is reference to the "*variety of historical themes with which rustic buildings in national parks are associated, prominent among which are tourism development and outdoor recreation, private/public ownership in parks and federal make-work projects in the Depression years*". Site specific information on these "historical themes" can be drawn from the Skoki plaque: "*rare and little-changed link with the early days of ski tourism ... first such facility to operate on a commercial basis in Canada.*"

- *X̲á:ytem / Hatzic Rock* In June 1992 the HSMBC recommended that "*because of the age of the Hatzic Rock habitation site and its close association to a transformer site of clear importance to the Stō:lo people, both elements of the site are of national historic significance.*" The Minute does not describe what is meant by the importance of the transformer site; however, the plaque text explains the significance of the transformer site: it exemplifies the importance of preserving Stō:lo history, culture and spirituality.

6.2.5 Using plaque texts

Where no reason for designation is given in the HSMBC recommendation(s) and none of the cases outlined in sections 6.2.1 through 6.2.4 apply, plaque texts should be used to identify commemorative intent.

6.2.5.1 Plaque texts prepared by members of the HSMBC versus those prepared by staff

Those plaque texts prepared by members of the HSMBC, especially those prepared within a short time of designation, have a stronger likelihood of clearly expressing the HSMBC's reasons for the site's designation than those written by staff, particularly after the 1960s. The earlier plaque texts are usually briefer and, as a result, more focussed. It is sometimes easier to draw conclusions about why the HSMBC thought the site was important.

At the same time, later texts (generally prepared by staff) often reflect different historiographical perspective(s), more extensive research, and provide mini-histories of the subject being commemorated.

Texts, regardless of authorship, are all approved by the HSMBC before the plaque is erected. All merit consideration. Not all statements within a text can be considered to communicate reasons for designation.

6.2.5.2 Opening sentence in plaque texts
Instructions to plaque text writers over the years have suggested that the opening sentence should incorporate the reason(s) for the site's designation. For a variety of reasons (including lack of consistency, changes in the text following review of the inscription, problems with the logical flow of text), one can not assume that the first sentence contains references to national significance. In determining reasons for designation, no preference should be accorded to the first sentence.

6.2.5.3 Concluding sentence in plaque texts
Writers of plaque texts often conclude with a statement which rounds out the site's story, usually by bringing it to the present. These sentences typically do not contain reasons for designation.

Statements which are not considered reasons for the site's designation are usually those that reflect a long chronological gap or have no direct connection to reasons identified prior to the concluding sentence. Some examples:

- *Boat Encampment* "*Bypassed by the railways, this historic spot was made accessible to visitors by the completion of the Big Bend Highway in June, 1940.*"

- *L'Anse aux Meadows* "*The site also contains evidence of a long sequence of native North American cultures occupying the area before and after the Norse.*" (draft text)

- *Fort La Tour* "*A few years later, the Simmonds, Hazen and White Company established a flourishing trade on this site which eventually grew into the city of Saint John.*"

Concluding sentences can also contain information relating to reasons for designation, and may be used for determining commemorative intent in the same ways as the rest of the text. For example:

- *Jasper Park Information Centre* "*As the first major building in the townsite, it helped to define the character of Jasper's early development ...*"

- *Fort Langley* "*On 19 November 1858 the colony of British Columbia was here proclaimed.*"

6.2.5.4 Firsts, uniqueness, rarity and superlatives used in plaque texts
Attention is often focused on the superlatives in plaque texts in order to distill reasons for designation. For example, one could use the following sentence to identify a reason for designation:

- *Elgin and Winter Garden Theatres* - "*this double-decker complex was unique in Canada*"

See 6.3.2 for a case study dealing with "firsts."

6.2.5.5 Test question
When attempting to determine reasons for designation from plaque texts, it is important to ask the following question - "*Would all sites which have this characteristic be of national historic importance?*" The answer to this question cuts to the heart of national historic significance and frequently provides the necessary touchstone upon which to evaluate whether a statement should be

considered a reason for designation.

In preparing the SOCI, testing individual reasons for designation will draw out comparisons with other sites with similar characteristics. This process will assist in determining whether the reason(s) for designation are sufficiently delineated and ensures a degree of consistency in the use and interpretation of plaque texts.

It is unlikely that posing the test question about a reason for designation will be conclusive. However, it will weed out possibilities that do not merit being cited as reasons for designation because of the comparative and contextual rigour that such a question imposes.

6.2.5.6 Use of texts for plaques which were not erected

Sometimes the HSMBC approves a plaque text but the plaque is never erected. Texts approved for plaques that were not erected, or that have not been erected within 5 years of approval, will *not* be used to determine commemorative intent. The current policy of the HSMBC is to have a text reconsidered by the HSMBC if the plaque is not erected within 5 years of approval. Plaque texts approved within the last 5 years can be used to assist in determining commemorative intent even though the plaque has not yet been erected.

New plaque texts written after the SOCI has been established will not change the commemorative intent for the site.

6.2.6 Use of HSMBC recommendations for interpretive programming

In the absence of reasons for designation in the minutes or an approved plaque text, recommendations for interpretive programming should be used to formulate the SOCI.

In most cases, however, such references appear in addition to clear reasons for designation. In such cases, the recommendation for interpretive programming should not form part of the SOCI, as illustrated in the following examples:

- *Diefenbunker* The Spring 1994 minutes state that the Diefenbunker should be designated "*because it is symbolic of the Cold War and the strategy of nuclear deterrence as well as a people's determination to survive as a nation following nuclear war.*" The minutes go on to suggest that if the bunker "*became an operational national site, some attention should be paid in its interpretation to its importance as an engineering achievement and to the critical path method of planning used in its construction.*"

- *Hershey Pavilion* The Fall 1997 minutes recommend that Hershey Pavilion (along with 4 other nurses' residences) is of national historic significance because of the association with the "*contribution of nurses and nursing to scientific medicine and to women's agency as health care professionals.*" The minutes go on to suggest that "*through interpretation of nursing at one of the above residences, appropriate attention be given in the interpretation to the fact that as it emerged people of colour, Aboriginals, Jews and other minority groups had been denied early entry into the nursing profession.*"

6.2.7 Use of submission reports

Since the 1960s, submission reports (formerly called agenda papers) have been prepared for the consideration of the HSMBC on subjects being proposed for designation. Submission reports are part of the designation process, containing

important information taken into consideration by the HSMBC. Submission reports are prepared for the information of the HSMBC but are not approved by it or by the Minister.

Submission reports are valuable for the context that they provide for the HSMBC's recommendation and assist readers in understanding commemorative intent as reflected in the HSMBC minutes and plaque texts. While they help in understanding commemorative intent and in providing a focus for the examination of the plaque text, they cannot be used to determine a site's commemorative intent.

6.3 Development of the SOCI - Case Studies

The content of these examples has been developed to be consistent with advice provided in this *Guideline*. Quotations from the minutes and plaque texts are in italics. The recommendations are indented.

6.3.1 Central Emergency Government Headquarters NHSC (Diefenbunker), Carp, Ontario

The "Diefenbunker" was considered twice by the HSMBC, first for the original designation and the second time after the Department of National Defence had stripped the site of its furnishings and equipment. This SOCI demonstrates the relative importance of HSMBC statements in determining why the site was designated.

HSMBC Minutes
June 1994
The "Diefenbunker": The Central Emergency Government Headquarters at Carp and the Continuity of government.

Following a lengthy discussion, the Board was unanimous in recommending that

> *the Central Emergency Government Headquarters at Carp, Ontario, known as the "Diefenbunker" should be designated a national historic site and commemorated by means of a plaque, because it is symbolic of the Cold War and the strategy of nuclear deterrence as well of a people's determination to survive as a nation following nuclear war.*

Further, as the Board felt that the "Diefenbunker", a poignant, tangible reminder of what was arguably among the most critical periods in the modern history of mankind, was of exceptional significance at the national level, it recommended that every effort be made to ensure that the facility, or a portion of it, is preserved, presented and made accessible to the public. In that regard, the Board urged Parks Canada to approach the owning department, other government agencies such as the National Museums, and the private sector and explore with them the feasibility of developing the "Diefenbunker", through co-management or otherwise, as an operational national historic site. The Board also urged that business, marketing and other studies which may be required to determine if the development of the "Diefenbunker" as a national historic site was a viable option, be undertaken at the first opportunity.

Finally, the Board recommended that if, as it hoped, the "Diefenbunker" became an operational national site, some attention should be paid in its interpretation to its importance as an engineering achievement and to the critical path method of planning used in its construction.

November 1994
The Board was then informed, by Dr. MacDonald, that the Central Emergency Government Headquarters at Carp, Ontario, the "Diefenbunker", had recently been stripped of its furnishings and fixtures. While the Canadian War Museum and the Museum of Civilization had been fortunate enough to be able to save a number of the artefacts, the majority of them had been or were to be disposed of through Crown Assets. Dr. MacDonald was of the opinion that, without its original equipment and furnishings, it would not be possible to develop the facility as an operating national historic site, an option which the Board had urged be most vigorously investigated when it recommended the "Diefenbunker" be designated a national historic site

at its June 1994 meeting.

The Board was extremely upset to learn that the facility had been gutted, as it believed that the "Diefenbunker" had been the most important surviving Cold War site in Canada. It was doubly disappointed to learn of the stripping of the facility as it understood that National Defence had been aware of its interest and had, in fact, been requested to advise the Program if it intended to move forward with its decommissioning.

The Board stated, however, that it was not prepared to rescind its recommendation regarding the national significance of the "Diefenbunker". Rather it urged the Program to actively investigate the possibility of capping and sealing the facility, so that it might be "frozen in time". It was hoped that, if this could be accomplished, at some time in the future it might be possible to reopen it and, through the reintroduction of those fittings seen to be essential to the telling of its story, or other means, provide Canadians with a meaningful interpretation of the story it so poignantly symbolizes - Canada and the Cold War.

Plaque

The following plaque text was approved by the HSMBC on 8 May 1998:

Irreverently known as the "Diefenbunker," this structure is a powerful symbol of Canada's response to the Cold War. Designed in the 1950s to withstand all but a direct hit by a nuclear weapon, it was intended to shelter key political and military personnel during a nuclear attack. Fortunately, it never served its intended purpose, although the Diefenbaker government made plans to retreat to its protection during the Cuban missile crisis of 1962. The bunker functioned as the hub of a communications network and civil defence system until it closed in 1994.

Analysis

The recommendation contains the reasons for designation: *because it is symbolic of the Cold War and the strategy of nuclear deterrence as well of a people's determination to survive as a nation following nuclear war.* In order to ensure that the SOCI can be used to develop the messages expressing the reasons for designation, the clause can be broken into two components.

Consideration was given to the following from the HSMBC's discussion: (1) *a poignant, tangible reminder of what was arguably among the most critical periods in the modern history of mankind* and (2) *some attention should be paid in its interpretation to its importance as an engineering achievement and to the critical path method of planning used in its construction* as reasons for designation. However, because the recommendation already contained clear reasons for designation, it was not necessary to use information contained in the HSMBC's discussion.

When the HSMBC reconsidered the Diefenbunker in November 1994, it stated that it believed that *the "Diefenbunker" had been the most important surviving Cold War site in Canada.* This statement was not included as part of commemorative intent because

- the statement was not part of a recommendation.
- it appeared that the HSMBC was simply contrasting the state of the bunker in June 1994 when it *had been the most important surviving Cold War site in Canada* with its unfurnished state in November 1994 when it was not.

If this were to be included as part of the SOCI, it would need to be returned to the HSMBC for consideration.

The plaque text is not needed to determine the reasons for designation because there are sufficient reasons contained in the HSMBC minutes on the designation of the site.

Statement of Commemorative Intent

The Central Emergency Government Headquarters, known as the "Diefenbunker", was designated a national historic site in 1994. The reasons for designation, as derived from the June 1994 HSMBC minute, are:

- ***it is symbolic of the Cold War and the strategy of nuclear deterrence.***
- ***it is symbolic of a people's determination to survive as a nation following nuclear war.***

6.3.2 St. Paul's Anglican Church NHSC, Halifax, Nova Scotia

Although St. Paul's was recommended for designation in 1981 and recommended for cost-sharing in 1986, there were no reasons given for the site's national significance. It was necessary to derive the reasons for designation exclusively from the 1985 plaque text.

HSMBC Minutes

November 1981

St. Paul's Church, St. Paul's Hill, Halifax, Nova Scotia

The Board recommended that

> *St. Paul's Church is of both national historic and architectural significance and should be commemorated by means of a plaque."*

November 1986

St. Paul's Church, St. Paul's Hill, Halifax, Nova Scotia

The Board first reaffirmed its November 1981 recommendation that

> *"St. Paul's Church is of both national historic and architectural significance and should be commemorated by means of a plaque."*

Further the Board stated that

> *"St. Paul's Church, Halifax, is of exceptional significance to Canada both historically and architecturally."*

Consequently, the Board also recommended that

> *"Parks consider St. Paul's to be a priority with respect to possible cost-sharing and that it enter into discussions with the Province of Nova Scotia, the City of Halifax and any other interested parties, in order to investigate the possibility of co-operating with them in the restoration of the Church's historic fabric."*

Plaque

The plaque text for St. Paul's was approved by the HSMBC at the June 1985 meeting. It reads:

Completed in 1750, St. Paul's was the first church outside Great Britain to be designated an Anglican cathedral. Between 1787 and 1864 it served as the cathedral church of the See of Nova Scotia. For 96 years St. Paul's was also the official garrison church for the army and navy establishment. The design of the building is based on that of St. Peter's, Vere Street, London, England, by James Gibbs. St. Paul's is the first building erected in the Palladian style in Canada. Despite the addition of wings and chancel, the original wooden frame, pre-cut in Boston, still forms the main body of the church.

Analysis

The original HSMBC recommendation of 1981 with respect to St. Paul's provides virtually no guidance on national significance except that the reasons are both historical and architectural - *St. Paul's Church is of both national historic and architectural significance*. Accordingly it would be reasonable to expect that St. Paul's would have reasons for designation relating to its history and to its architecture.

Consideration for cost-sharing in 1986 resulted in little additional information except to note that the site was of *exceptional significance* (a phrase which gives it priority with respect to the cost-sharing program) and that *restoration of the Church's historic fabric* was a priority.

Because of the lack of information in the minutes (for either designation or cost-sharing), it was necessary to turn to the 1985 plaque text which provided the following:

- *"St. Paul's was the first church outside Great Britain to be designated an Anglican cathedral."* Use of the word "*first*" and the relative importance of the designation provides an indication of significance.
- *"St. Paul's is the first building erected in the Palladian style in Canada."* This statement illustrates an important achievement in design and indication of significance.

Statement of Commemorative Intent

St. Paul's Church was designated a national historic site in 1981. The reasons for designation, as derived from the 1985 plaque inscription, are:

- ***it was the first church outside Great Britain to be designated an Anglican cathedral,***
- ***it is the first building erected in the Palladian style in Canada.***

6.3.3 St. John the Baptist Roman Catholic Basilica NHSC, St. John's, Newfoundland

The reasons for the Basilica's designation were not stated with the recommendation for designation in November 1983. However, they were stated (albeit somewhat obtusely) in the consideration for the cost-sharing program in February 1989. Given that the reasons for designation stated as part of the site's evaluation for cost-sharing take precedence over the 1984 plaque text, it was not necessary to consider the plaque text to develop the SOCI.

HSMBC Minutes

November 1983

The Basilica of St. John the Baptist, St. John's, Newfoundland

The Board recommended that

> *"the Basilica of St. John the Baptist is of both national historic and architectural significance and should be commemorated by means of a plaque."*

November 1988

The Basilica of St. John the Baptist, St. John's, Newfoundland

The Board first reaffirmed its November 1983 recommendation that

> *the Basilica of St. John the Baptist is of both national historic and architectural significance and should be commemorated by means of a plaque.*

During the course of the Board's discussion of the question of possible financial assistance, through the National Cost-Sharing Programme, to aid in the restoration of the Basilica, it was noted that the Building had been an important focus for the religious, social and political life of Newfoundland. There was, however, general agreement that there were a number of religious institutions in Canada which could make similar claims and it was, therefore, recommended that further consideration of the Basilica be deferred pending the preparation of a brief paper placing it in the context of other large cathedrals of the period, which had, over time, comparable influence on the development of their regions.

February 1989

The Basilica of St. John the Baptist, St. John's, Newfoundland

BACKGROUND

In November 1983, the Board considered the Basilica of St. John the Baptist and recommended that the Basilica of St. John the Baptist is of both national historic and architectural significance and should be commemorated by means of a plaque.

In November 1988, the Basilica went back to the Board for consideration as a potential candidate for funding through the National Cost-Sharing Program and during the course of the Board's discussion it was noted that the building had been an important focus for the religious, social and political life of Newfoundland. There was, however, general agreement that there were a number of religious institutions in Canada which could make similar claims and it was, therefore, recommended that further consideration of the Basilica be deferred pending the preparation of a brief paper placing it in the context of other large cathedrals of the period, which had, over time, comparable influence on the development of their regions.

RECOMMENDATIONS

The Board had no hesitation in reaffirming its November 1983 recommendation respecting the national significance of the Basilica of St. John the Baptist. The Board also noted once again that the Basilica had played an important role in the religious, social and political life of its region; however, the study before it, Mid-Nineteenth Century Cathedrals, indicated that the Basilica was by no means unique among Canadian cathedrals in this regard and , consequently, it could not be seen to be of exceptional national significance. Nonetheless, the Basilica's Lombard Romanesque architectural style was of great interest and the Board recommended that:

when those cost-sharing projects that are considered to be priorities have been completed, the Program should enter into discussions with the City of St. John's, the Province of Newfoundland and other interested parties with a view to entering into a cost-sharing agreement to restore the Basilica of St. John the Baptist - federal monies being directed to the restoration of the Cathedral's exterior historic fabric.

Plaque

The HSMBC approved the plaque text for the Basilica of St. John the Baptist in June 1984. It reads:

The Roman Catholic Church was formally established in Newfoundland by Irish settlers at the end of the 18th century and since that time has played a key role in the religious, political and social history of the province. The Basilica of St. John the Baptist stands as the principal symbol of the church in Newfoundland. Begun in 1841 it was an ambitious project for its time and reflected the intent of Bishop Michael Anthony Fleming to erect a cathedral of unusual elegance, extent and beauty. The design, inspired by romanesque churches of Italy, was one of the earliest examples of this stylistic revival in North America.

Analysis

The HSMBC's original recommendation in November 1983, recommended only that the Basilica was of *both national historic and architectural significance.* The 1989 recommendation does not speak to commemorative intent.

Although a plaque text was approved in June 1984, the priority for determining commemorative intent is the record of discussion associated with the cost-sharing recommendation. In February 1989, the HSMBC identified the two reasons for the site's designation:

- *the Basilica's....important role in the religious, social and political life of its region.*
- *the Basilica's Lombard Romanesque architectural style.*

With respect to its role in the region, the HSMBC noted that the Basilica was not of *exceptional* [emphasis added] *national significance* and *by no means unique among Canadian cathedrals in this regard.* The word "*exceptional*" was used in the context of establishing cost-sharing priorities, and was not intended to be interpreted as meaning "nationally significant."

Because commemorative intent was established as a result of the cost-sharing recommendation, it was not necessary to use the plaque.

Statement of Commemorative Intent

The Basilica of St. John the Baptist was designated a national historic site in 1983. The reasons for designation, as derived from the 1989 HSMBC minute, are:

- ***the Basilica's important role in the religious, social and political life of its region.***
- ***the Basilica's Lombard Romanesque architectural style.***

6.3.4 Province House NHSC, Charlottetown, Prince Edward Island

Province House was the subject of two HSMBC recommendations (1966 and 1980), both of which contribute reasons for the site's designation. Province House is also mentioned in the designation for the Great George Street historic district. Other plaques mounted at the site do not contribute to reasons for the site's designation.

HSMBC Minutes

October 1966

The Board recommended the following resolution:

The Board is satisfied that the Province Building is of national historic significance but it cannot recommend that the Federal Government aid in its preservation and maintenance under the terms of the letter of April 21, 1966 which the Premier of Prince Edward Island has sent to the Chairman of the Board.

June 1980

The Committee agreed that an ad hoc approach to the identification of Canadian Court Houses of national significance would not serve the purposes of the Board. A lengthy discussion of possible selection criteria ensued, following which the Committee recommended that Court Houses selected for commemoration by the Board would be identified as falling into one of three distinct categories:

These categories are:
Category I
One Court House in each province which is to be commemorated as being representative of the judicial institution in that province.

The Committee then began the selection of those Court Houses which were to be recommended for commemoration by means of a plaque, under Category I.

The Committee recommended the following Court Houses to be of both national historic and architectural significance as being representative of the judicial institution in their respective provinces and in the Yukon Territory.
4) For the Province of Prince Edward Island
Province House, Charlottetown, Prince Edward Island
The Committee recommended that as the judicial function of Province House will be handled in the interpretation of the structure no action be taken. Should the Law Courts Building in Charlottetown be restored the Committee recommended that it be plaqued as being representative of the judicial institution in Prince Edward Island

Plaque
The following text for Province House was approved in 1970 but the plaque was not erected:

PROVINCE BUILDING
Completed in 1847 from grey freestone cut in Nova Scotia, this legislative building has remained unchanged to the present day. Its Georgian style is a fine example of the regularity, symmetry and order of the eighteenth century classical form. In September, 1864, the first conference on Canadian federation was held in the Legislative Council room, now the Confederation Chamber.

A new plaque text was approved in November 1981.

PROVINCE HOUSE
Completed in 1847, this neo-classical building was designed and built by local architect Isaac Smith to accommodate the provincial legislature and administrative offices. It also housed the Island's Supreme Court until 1872. Province House retains its central role in Island public life, with the Assembly holding sessions here. In September 1864 it was the scene of the first conference on colonial union. Delegates from the colonies of Prince Edward Island, New Brunswick, Nova Scotia, and Canada met in the legislative council chamber, now the Confederation Chamber, to begin discussions which led to confederation in 1867.

Related Designations and Other Plaques
- Great George Street "*stretching from Richmond Street to the Charlottetown waterfront and including Province House*" was recommended as an historic district by the HSMBC in November 1990.
- Plaques commemorating the seven Island Fathers of Confederation are located on the grounds of Province House.

Analysis
With the initial recommendation in 1966, the HSMBC recommended only that *Province Building is of national historic significance* but did not provide any reasons.

When considered under the Canadian court houses study, the HSMBC recommended that Province House was of *national historic and architectural significance as being representative of the judicial institution* in Prince Edward Island.

In order to determine the reasons for designation related to the initial recommendation it is necessary to analyze the 1981 plaque text. The 1970 plaque text is not considered as it was never erected.

Based on the analysis of the 1981 plaque text one of the reasons for designation relates to the Charlottetown Conference.
- *In September 1864 it was the scene of the first conference on colonial union ... which led to*

confederation in 1867.

The Great George Street historic district designation should be clearly mentioned in the CIS as a designation which includes Province House, but it does not form part of the SOCI for Province House. Rather, it should follow the SOCI and be introduced as follows: It should be noted that Province House forms an integral part of Great George Street NHSC.

Plaques commemorating the seven Island Fathers of Confederation are related to the reasons for the site's designation but do not contribute to the SOCI. The plaques are resources not related to the reasons for designation.

Statement of Commemorative Intent

Province House was designated a national historic site in 1966. The reasons for designation, as derived from the 1981 plaque inscription and the 1980 HSMBC minute, are:

- ***it was the site of the first conference on colonial union in 1864 which led to confederation in 1867.***
- ***it is representative of the judicial institution in P.E.I.***

6.3.5 Augustine Mound NHSC, Red Bank, New Brunswick

In some instances where the HSMBC minutes record only that the site is nationally significant but no reasons are given and there is no plaque text, it will not be possible to develop a SOCI without referring the matter to the HSMBC.

HSMBC Minutes

November 1975

Dr. Thomas next presented for decision by the Board the question of the Augustine Mound Site in New Brunswick. A slide presentation and illuminating commentary by Drs. Wright and MacDonald convinced the Board that this was a most exciting discovery and the recommendation of the Fur Trade and Indigenous Peoples Committee was adopted as follows:

> *that the Augustine Mound Site in Northumberland County, N.B., is a site of national historic significance, and that appropriate means should be taken to ensure its preservation and interpretation.*

Plaque

No plaque texts have been approved.

Related Designations and Plaques

In June 1982, the HSMBC recommended that

> *"the Oxbow Site in New Brunswick is of national historic significance"*

[and that] *the Atlantic Region, Parks Canada, be encouraged to develop the relationship between the Oxbow Site and the Augustine Mounds* [sic] *which were declared to be of national significance in 1975.*

Analysis

Augustine Mound is of national historic significance but no reasons were given for its significance.

Statement of Commemorative Intent

It was not possible to derive a SOCI from the information which is available. Consequently, the question was referred to the HSMBC.

Guideline No. 7

Designated Place

Designated Place refers to the place designated by the Minister of Canadian Heritage on the recommendation of the Historic Sites and Monuments Board of Canada (HSMBC). Information on what constitutes the Designated Place for a particular national historic site is drawn from the minutes of the HSMBC.

The *Historic Sites and Monuments Act* identifies the HSMBC as the Minister's advisors with respect to the "marking or commemoration of historic places" (section 7). The act defines *historic place* as "a site, building or other place of national historic interest or significance, and includes buildings or structures that are of national interest by reasons of age or architectural design."

In preparing a CIS, *Designated Place* has the same meaning as *historic place* as used in the *Historic Sites and Monuments Act*. *Designated Place* is used in lieu of *historic place* because it is more descriptive and less likely to be misunderstood by readers both inside and outside Parks Canada.

7.0 Guidelines for Preparing the Description of Designated Place

The Designated Place for a national historic site must be clearly described in the site's CIS. Designated Place is a geographically definable location which is circumscribed by boundaries. A map of the site should be included as part of the CIS (either in the Designated Place section or as an appendix) showing the Designated Place clearly. A notional circle around the administered site is not sufficient.

Current HSMBC recommendations include a precise description of Designated Place. The HSMBC has also provided guidelines to help interpret past recommendations where Designated Place was not explicitly identified. These guidelines may be expanded or up-dated periodically by the HSMBC.

When the guidelines do not result in a clear Designated Place, then the question is referred back to the HSMBC. See section 7.1.5 - *The Oxbow Site* for a case study. The procedures for returning to the HSMBC are in section 3.4 of Guideline No. 3 - *Referring Statement of Commemorative Intent and Designated Place to the HSMBC.*

In December 2000, the HSMBC provided the following advice on how it would deal with issues relating to Designated Place:

- In interpreting existing HSMBC recommendations, a strict constructionist approach will be used, in accordance with the guidelines below.
- In considering proposals to expand the Designated Place, the HSMBC will not be constrained by existing recommendations but will treat each new proposal on its merits, and with the understanding that the owner(s) of property directly affected by the expansion of Designated Place give their consent.

This advice informs any analysis of Designated Place.

The guidelines for determining Designated Place, as approved by the HSMBC in November 1999 and June 2001, are:

1. **The approved HSMBC minute is considered the definitive statement of the HSMBC's intent.**

The approved HSMBC minute is the record of the deliberation and discussion undertaken by the HSMBC. Where there is no explicit statement in the minute describing the nature and extent of the Designated Place, the HSMBC's obvious intent, if it can be inferred *with assurance*, should be followed. See section 7.1.1 - *Ruin of St. Raphael's.*

2. **If the approved minute refers to a description in a submission report or agenda paper relating to the extent of the Designated Place, then that description should be consulted.**

Where there is no such reference, the submission report can not be used. If the approved minute refers to a description in the submission report but that description is unclear, ambiguous, or contradictory (e.g., between text and illustrations), the extent of the Designated Place will have to be referred to the HSMBC. See section 7.1.2 - *Esquimalt Naval Sites* for a case study.

3. **A plaque text will not be used to determine the Designated Place.**

Plaque texts approved by the HSMBC were never intended to define the Designated Place. See section 7.1.3 - *Fort Pelly* for a case study.

4. **The reasons given for national significance do not determine the Designated Place.**

A resource associated with the *reasons* for designation should not be included in the Designated Place unless the HSMBC specifically states in the approved minute that the resource is part of the Designated Place. Given the scope of many reasons for designation as a national historic site (for example, association with the War of 1812, or close association with a critical period in Dene/Euro-Canadian relations), the reasons for designation cannot be used to determine Designated Place. See section 7.1.4 - *Hay River Mission Sites* for a case study.

5. **The Designated Place is the place that was considered by the HSMBC at the time it made its recommendation, unless otherwise specified in the minute.**

For example, in the case of the designation of the Stephen Leacock Museum/Old Brewery Bay, the 9 acre property considered by the HSMBC is the Designated Place, not the larger property originally owned by Leacock.

Designated Place can only be changed by the Minister, acting on the advice of the HSMBC. Consequently, additions or deletions to a property made subsequent to a designation do not result in a change to Designated Place, unless formally sanctioned as additions or deletions to the Designated Place.

6. **When the boundaries of a national historic site were not defined at the time of designation, and the physical feature named in the recommendation of national historic significance was located on a single legally-defined property at the time of designation, the boundaries of the Designated Place are deemed to be the boundaries of the property at that time, subject to the Scope and Exceptions statement that accompanies this guideline.**

The scope of this guideline includes national historic sites designated before 1999 and not assigned boundaries at the time of designation. At the time of designation, the whole of the nationally significant feature (or features) must have been located on a single, legally-defined property or parcel of land, or on adjoining properties owned by the same person or persons. Since designation, the property must not have been subdivided or had its boundaries redrawn in a way that affects ownership of the feature named in the designation.

For reasons of size and complexity, several types of properties are excluded from the application of this guideline. These exceptions relate to sites where the designated feature forms all or part of any of the following:

- an institutional complex, such as a university, hospital, ecclesiastical precinct, or airport;
- defence works, notably forts, and sites of military operations, such as battlefields;
- a trading post, whether styled a "fort" or not;
- a fairground;
- a linear route or property (e.g. railway stations, roundhouses, dams, bridges, aqueducts, canals and trails);
- a Canadian Forces Base;
- a First Nations Reserve;
- lands administered by Parks Canada;
- an extensive property, such as an estate or an industrial complex, which was subdivided before designation in a manner that left potential level one resources (either above or below ground) outside the administered place;
- sites designated for their archaeological value, or as cultural landscapes of associative value.

Vessels which are considered to be "places", shipwrecks, and moveable cultural heritage objects are also excluded.

See section 7.1.6 - *The Granada Theatre* for a case study.

7.1 Determining Designated Place - Case Studies Using the HSMBC Guidelines

7.1.1 Ruin of St. Raphael's Roman Catholic Church, St. Raphaels, Ontario

HSMBC Minutes
June 1996

"...the Board recommended that the ruin [emphasis added] *of St. Raphael's Roman Catholic Church in St. Raphael's, Ontario is of national historic significance and should be commemorated by means of a plaque because it is one of the earliest Roman Catholic monuments in English-speaking Canada and a significant testament to the establishment of the Roman Catholic church in Upper Canada.*

The Board felt that the fact that, during the 1820's, Alexander Macdonell, the first Roman Catholic Bishop of Upper Canada, administered his see from St. Raphael's and its parish remained the largest and most important in the province until the 1840s also contributed to the significance of the ruin as did its continued setting in an ecclesiastical precinct and a rich historic landscape which includes a burying ground and readapted historic buildings."

Analysis and Description of Designated Place

The description of the place found in the HSMBC minute is explicit and provides sufficient information to be able to identify a geographically definable location. The HSMBC recommended the ruin as the place to be designated. Therefore, the description of the Designated Place, as described in the CIS, is the ruin of the church.

7.1.2 Esquimalt Naval Sites, Esquimalt,

British Columbia

HSMBC Minutes
November 1995
"Four Naval Station Sites, Esquimalt, British Columbia

... following some consideration, the Board recommended that

> *HMC Dockyard, the former Royal Navy Hospital, the Veteran's Cemetery and Cole Island, at Esquimalt, British Columbia collectively constitute a historic district of national historic and architectural significance which should be commemorated by means of a plaque.*

The Board recommended that the four naval station sites, as defined in the paper before it [emphasis added], *are collectively of national significance because they contain a wealth of built resources, unique among Canadian military bases and sites and they represent a continuum of defence themes, from the Imperial defence period, through the creation of the Royal Canadian Navy, to Canadian naval institutions in wartime and as a member of post-war alliances. Further, many of the extant resources are in homogeneous groupings which promote a distinctive sense of place, and the Royal Navy Dockyard compound is a rare surviving, largely intact, example of the many 18th and 19th-century Admiralty bases which once circled the globe. Finally, the sites illustrate the range of facilities required for the operation of an Imperial naval station headquarters, and the Dockyard contains those facilities and building types necessary for the maintenance of the modern Canadian naval fleet."*

Analysis and Description of Designated Place

The submission report may be consulted if it contains an explicit description relating to the extent of the Designated Place and the minute refers to that description. In this example, as the HSMBC minutes refer to an area defined in the submission report, the following descriptions of Designated Place were used, based on clear, unambiguous and non-contradictory information found in the submission report:

HMC Dockyard - The Designated Place is comprised of the entire Dockyard site as it has existed since the most recent site expansion of 1941. It consists of the area west of the administrative boundary of Signal Hill and bounded by the shorelines of Constance Cove, Esquimalt Harbour, and the Strait of Juan de Fuca. The Dockyard-Signal Hill boundary, as illustrated on the 1994 drawing...is marked by a fence, which extends from the parking area immediately east of the main Dockyard gate north behind (east of) Dockyard buildings 215, 149 (A&B), the line of which is continued by the rear (east) elevation of building 141.

Royal Navy Hospital - The Designated Place for the former Royal Navy Hospital encompasses five structures original to the complex (buildings 20, 29, 35, 37 and 39)...and two small infill structures (buildings 36 and 38), as situated around the original hospital courtyard; and one additional building (no. 56) which is located at some distance from the principal group. The Designated Place boundaries are defined by the north (side) elevation of building 39; by the west (rear) elevations of buildings 39-35; by the base of the cliff which extends from the south (side) elevation of building 35, and south of building 29 east to building 20, and continuing around the circumference of the courtyard to the beginning point of building 39. For building 56, remote from the above complex, the Designated Place consists of the building on its footprint.

Veterans' Cemetery - The Designated Place consists of the entire 2.2-acre rectangular cemetery site, and includes the stone wall and steel fence which delineate the property boundaries.

Cole Island - The Designated Place is Cole

Island, in its entirety, including...three extant buildings and any underwater remains of two buildings and a jetty, all of which extend beyond the shoreline to the waters of the harbour.

7.1.3 Fort Pelly, Saskatchewan

HSMBC Minutes
May 1953

"That the site of Fort Pelly [emphasis added] *be declared of national historic importance, and the Board recommends that the Department accept the gift of the five acre plot of land on which the fort stood."*

October 1971
"Inscriptions were approved as follows:
(3) FORT PELLY II

This post, built in 1856 by Chief Factor W.J. Christie of the Hudson's Bay Company, replaced the first Fort Pelly which stood on the low ground to the west of this spot. For almost half a century the headquarters of the Swan River District, it was the last of a series of posts at the Assiniboine Elbow dating back to 1793. This large establishment with its substantial buildings and fine herds of horses and cattle excited the admiration of many early travellers who passed this way along the Carlton Trail. Fort Pelly was abandoned at the beginning of the twentieth century."

Analysis
The plaque text can not be used to determine Designated Place. The Designated Place is "the site of Fort Pelly" as stated in the minutes, not the first Fort Pelly or the Swan River District as mentioned in the plaque text.

7.1.4 Hay River Mission Sites, Hay River, Northwest Territories

HSMBC Minute
June 1992
The Board recommended that

"because of their close association with a critical period in Dene/Euro-Canadian relations, the Hay River Mission Sites, consisting of St. Peter's Anglican Church, St. Anne's Roman Catholic Church and Rectory, and the two church cemeteries with their numerous spirit houses are collectively of national historic and architectural significance and should be commemorated by means of a single trilingual plaque."

Analysis and Description of Designated Place
The Designated Place comprises those resources described by the HSMBC as being of national historic and architectural significance (i.e., "*St. Peter's Anglican Church, St. Anne's Roman Catholic Church and Rectory, and the two church cemeteries with their numerous spirit houses*"), and does not include other resources associated either with the reasons for designation (e.g. any/all resources closely associated with a critical period in Dene/Euro-Canadian relations), or with the Hay River Mission Sites.

As a result of this recommendation, the Designated Place for the Hay River Mission Sites, consists of St. Peter's Anglican Church, St. Anne's Roman Catholic Church and Rectory, and the two church cemeteries with their numerous spirit houses.

7.1.5 The Oxbow Site, Red Bank, New Brunswick

HSMBC Minute
June 1982
The Board recommended that

"the Oxbow Site [emphasis added] *in New Brunswick is of national historic significance."*

Analysis
This description alone is not sufficient to identify the exact place which the HSMBC recommended in 1982.

There is no explicit statement in the minute describing the nature and extent of the

Designated Place, the HSMBC minute does not make reference to the extent of the Designated Place described in a submission report, and the HSMBC's obvious intent in the minute cannot be inferred with assurance. Consequently, the matter was referred to the HSMBC for clarification of the Designated Place.

7.1.6 The Granada Theatre, Sherbrooke, Québec

HSMBC Minute
June 1996
"The Board, after some discussion, recommended that *Sherbrooke's Granada Theatre is of national historic and architectural significance and should be commemorated by means of a plaque.*"

Analysis and Description of Designated Place
This site falls within the scope and is not one of the exceptions associated with the sixth guideline. The boundaries of the place were not defined at the time of designation. However, the theatre is located on a single legally-defined property, as it was at the time of designation. The boundaries of the Designated Place are therefore the boundaries of the property.